



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

August 30, 2006

RE: FCC ID: OWDTR-0042-E_ATCB003913 Attention:
Kathy Grzovic / Rick McMurray

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1 Please note that the test report says that radiated emissions (section 6) were done IAW 90.543(c). That section of the rules deals with out of band emissions for devices transmitting in the 764 - 776 MHz and 794 - 806 MHz range. This device is in the 450-470MHz range. Please explain why this rule section was used and how it applies to this device. Please correct as necessary.

Response: No testing was done to 90.543c – please refer to the revised report uploaded with this response.

2 Please note that the test report says that occupied bandwidth (section 7) was done IAW 90.543(a). That section of the rules deals with the adjacent channel power of devices transmitting in the 764 - 776 MHz and 794 - 806 MHz range. This device is in the 450-470MHz range. Please explain why this rule section was used and how it applies to this device. Please correct as necessary.

Response: No testing was done to 90.543a – please refer to the revised report uploaded with this response.

3. Please note that frequency stability in section 8 of the report is said to be done under 90.539. Please note that 90.539 is Frequency stability for devices in the 764–776 MHz and 794–806 MHz range. Frequency stability for devices in the 450-470MHz range would typically be done under 90.213 subparagraph 8. This device is in the 450-470MHz range. Please explain why this rule section was used and how it applies to this device. Please correct as necessary.

Response: No testing was done to 90.539 – please refer to the revised report uploaded with this response.

4. Please note that because of Items 1 and 2 above, please clearly specify the part 90 rule part used for power, radiated spurious emissions and emissions mask (Occupied BW). Alternately, please justify the use of the sections dealing with 764 - 776 MHz and 794 - 806 MHz as pertinent to a device operating in the 450-470 MHz range.

Response: All Part 90.5XX references removed from report. Power is done IAW 2.1046, radiated spurious is tested IAW with IAW 2.1053, and Emissions Masks are tested IAW with 2.1049 and 90.210. Please refer to the revised report uploaded with this response.

A handwritten signature in cursive script that reads "Dennis Ward".

Dennis Ward

<mailto:dward@AmericanTCB.com>

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.