



Washington Laboratories, Ltd.

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June 9, 2008

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

RE: Comments of June 5, 2008
APPLICATION: OYE-MWCK02 Miller Edge, Inc.

Dear Mr. Fabina:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in ***bold italic***. Many responses refer you to additional exhibit(s) which has been uploaded to the application folder at the ATCB website.

Thank you for your attention. Please feel free to contact us for any additional information that you may require.

Regards,

Steven D. Koster
EMC Operations Manager

Brian J. Dettling
Documentation Specialist

WLL Project: 10306

1) Michael Anderson is listed as the contact person for Miller Edge, Inc. (MEI) on the FCC Grantee Code Database. As such, he is the authorized person to sign the FCC agent letter and request for confidentiality letter for MEI. Unfortunately Tim Castello has signed these letters submitted with this application. Please either provide a letter from Michael Anderson giving Tim Castello the authority to sign the FCC agent letter and request for confidentiality letter for MEI on this application or submit new agent and request for confidentiality letters signed by Michael Anderson for this application. Alternatively you can have the FCC Grantee Code Database changed to show Tim Castello as the contact person for MEI. If you need help in getting the FCC Grantee Code Database changed, please contact Ms Marianne Bosley by email at Marianne@atcb.com. (See second attachment).

R. The contact and address information has been updated at the FCC website at this time to match the name(s) and address shown on the cover letters.

2) The request for confidentiality letter also refers to the wrong FCC Rule. Rule 47 CFR 0.159 does not exist. Please amend the confidentiality request letter to refer to the correct rules for requesting confidentiality of exhibits in an application.

R. The typo in the request letter has been fixed. Please see “Request for Confidentiality revised.pdf”

3) Please provide a cover letter exhibit that requests a class II permissive change and describes how the modified device qualifies for a class II permissive change based on the changes permitted in Section 2.1043 of the FCC Rules.

R. Please see “MWCK02 Ver C to Ver F Differences.pdf”.

4) Please clarify if a duty cycle correction factor was used for the radiated emissions results in Table 4 of the test report and how they were obtained. The formula above this table includes a DCCdB (duty cycle correction in dB) factor in the equation but I do not know if it was used or not. And there are no duty cycle plots in the test report for determining what the DCCdB factor would be.

R. The Duty Cycle correction factor was not used so the report could more closely follow the original certification report that did not use the DCC factor.

5) Please clarify if the radiated emission results in Table 4 are peak detector emission levels or something else. Section 2.1 of the test report describes the emissions from this transmitter as Manchester encoded (implying pulses). Section 4.2.1 of the test report indicates average measurements were made with a 10 Hertz video bandwidth (commonly referred to as video averaging). The formula above the table shows duty cycle correction factor (see item above).

R. The emissions were recorded in peak so the report could more closely follow the original certification report that had reported peak emissions.

6) Please provide internal photos of the modified device since the appearance of the device has changed since it was originally approved.

R. Please see “MWCK02 PCII Internal Views.pdf”

7) For Your Information – The address on the FCC application form does not match the address for Miller Edge, Inc. on the FCC Grantee Code database. ATCB cannot change the FCC Database address to match what is on the FCC application form. When we select Grantee Code OYE, the FCC database automatically fills out the address and contact information for Miller Edge, Inc. on the grant. If you want the address that appears on the submitted application form to appear on the grant for this device, you must have it changed in the FCC Grantee Code database first. Otherwise the grant will be issued with the address listed in the database: 300 North Jennersville Road P. O. Box 159, West Grove, PA 19390. (See third attachment).

R. The contact and address information has been updated at the FCC website at this time to match the name) and address shown on the application form.