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FCC Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

13 February 2006

Attention: Reviewing Engineer
Re: Class 2 permissive change application for Vyyo Inc.
FCC ID: PBJV3000-A
Date of Original Grant: 01/30/2006

Equipment: Part 27 Non-Broadcast Transmitter, A-band 776-777 MHz

Hello,

On behalf of my client Vyyo Inc. I am submitting an application for a class 2 permissive change for the equipment associated with the referenced identifier. The firmware and software of the referenced device have been modified to accommodate different channel bandwidths. No hardware changes have been made to the product. The affected rule sections are 47CFR27 sections 27.53 (d) through (f).

The Rules seem ambiguous with respect to allowed channel bandwidth, since the entire 746-747 MHz allocation is assigned to a single licensee. As such, in-band emissions are the concern of the licensee, whereas out of band emissions must meet all emissions limits in the Rules in order to protect other users of the spectrum.

A test report has been submitted demonstrating that for channel bandwidth of up to 317 kHz, out of band emissions are well within the attenuation minimum of $43 + 10\log P$ dB below transmitter output power (-13dBm limit), as required by paragraphs 27.53(d)3 and 27.53(f).

If you have questions or need further information, please contact the undersigned.

Sincerely,



THOMAS N. COKENIAS
EMC Consultant

Agent for Vyyo Inc.