Washington Laboratories, Ltd.

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February 6, 2008

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

RE: Comments of October 30, 2007
APPLICATION: PYN2007VMD ComSonics, Inc.

Dear Mr. Johnson:

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: 9898

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1) FYI….Due to various concerns recently seen about proper authority being given to others for FCC and/or IC matters, the agency letter should be signed by someone traceable to have the proper authority. For instance, the FCC site shows Richard Shimp as the correct contact of authority for FCC matters. Therefore the agency letters should be signed by this contact or alternatively a letter showing who he has "deputized" to sign on his behalf may be provided as well. Please correct this in future applications.

R. Noted.

2) IC form appears to use the wrong CN Number. Please review.

R. The form has been corrected. Please see "VMD Application Form - IC revised".

3) Users manual should contain appropriate RF exposure information i.e. – no collocation and 20 cm user to antenna distance. Note that the test report RF exposure mentions a 50% duty factor which mentions theory of operation. However theory of operation does not appear to address duty factor at all.

R. The 50% duty cycle was determined at the laboratory. The unit only transmits once with each trigger of the HHD. The maximum re-trigger rate was found to be 1 second. It was with this information the duty factor was calculated.

4) Please provide information regarding the type of emissions used by this device.

R. The emissions from the VMD is a single un-modulated pulse used to determine the shielding effectiveness of residential cable systems. The pulse is received by the HHD.

5) Please provide information regarding both DC voltages AND currents applied into the several elements of the final radio frequency amplifying device for normal operation over the power. (2.1033(c)(8)).

R. From the client: The final amplifying device is powered with 10 volts at 800mA.

6) Please provide factory tune-up procedure for this device.

R. Please see "VMD TuneUp Procedure".

7) Please provide appropriate RF exposure information/calculations. Please note that 2.1091 requires RF evaluation (measurements) for devices of this power level. Please provide.

R. Please see Section 5 of the test report.

8) Why does the test report mentions 00-705 (Frequency hopping procedures) and ANSI C63.4 (unlicensed test procedures? This device is a licensed transmitter.

R. The report has been changed to reflect the proper test procedure, ANSI/TIA/EIA-603.

9) Please explain compliance to 90.203(f)/(g).

R. The unit is not remotely programmable. The remote can only cause the unit to transmit on it's fixed frequency and power, so 90.203(f)/(g) are not relevant.

10) Please review equipment code listed on the 731 form. This device does not appear to be what would be expected of an LMS device. See Part 90, Subpart M.

R. The unit is not an LMS device. It is used to illuminate a homes' cable system to determine the shielding effectiveness of the cable shield. It transmits an unmodulated carrier; that is why we used N0N.