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.

1A) (2.17) Original Item 1 was an FYI because information at that time was being released and we were trying to be "graceful" about this for awhile....However given it is now about 3 months later, it is difficult to justify to the FCC why this one is not corrected. I can attempt to go ahead as an FYI, or you can provide the letters to assure there is

no problem. Kindly let me know which way you would like to move forward on this issue.

R2. Please see "VMD Cover Letter – LOA revised". NOTE: We reiterate that confidentiality is not sought by the applicant.

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

2A) A corrected form for 2) does not appear to have been provided. CN appears to be 4261A.

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

R2. Apologies for the oversight. The corrected form should now be available.

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.

3A) Appropriate RF exposure information does not appear have been presented in the manual as given in previous item 3)

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.

R2. The User Manual has been updated. Please see "Qualifier X-Ray UG_101399-001 Rev_B page 2008_02_22 a72".

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 "VMD Test Report revised - MPE".

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.

10)(2.17). Given the response to item 10), please update Section III, Item 4(a) for the appropriate equipment type.

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.

R2. The Equipment Code has been updated. Please see "VMD Application Form – 731 rev 2".