



Washington Laboratories, Ltd.
7560 LINDBERGH DRIVE
GAITHERSBURG, MD 20879
(301) 417 - 0220 FAX # (301) 417 - 9069

December 4, 2002

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

RE: Comments of November 29, 2002
APPLICATION: PYN22002B ComSonics, Inc.

Dear Mr. Ward:

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,

Gregory M. Snyder
Chief EMC Engineer, Wireless/Telco Services Manager

Brian J. Dettling
Documentation Specialist

WLL Project: 7276

November 29, 2002
RE: ComSonics, Inc.
FCC ID: PYN22002B

1) Please provide information on how the label is permanently affixed to the product. The label location file is not readable enough to determine if this information is present.

R. A new label drawing has been prepared which details the materials used. Please see exhibit "New Label.pdf"

2) Please note that 15.231 devices CANNOT transmit data. This is strictly forbidden. Also please note that the operational description for this device specifically states that this unit transmits data (it states, RFM's TX-series hybrid transmitters are specifically designed for short-range wireless data communication applications.") The device is not certifiable under these conditions. Please correct all documentation to clearly state the intent of this device. Is it to transmit control codes to a separate device, or other purposes? Is it in a composite device? Has application for certification been done for the other part of the composite device? How does this fit a 15.231a device? If there are two separate transmitters in this system you must CLEARLY describe each specific transmitter and how it functions. This description cannot be ambiguous or confusing.

R. The test report has been revised to provide a clearer description of the unit. Please see exhibit "Revised PYN2202B Test Report.pdf". The device for which this certification is being pursued is the Qualifier meter which only sends a control code to the Test Source Transmitter (FCC ID: PYN12002A) to initiate its activity. It may be helpful to bring to your attention that the Qualifier meter (FCC ID: PYN22002B) in this application is operationally identical to the previously approved Qualifier meter (FCC ID: PYN22002A). Internal design changes required that the client obtain a new FCC ID for this unit. The theory of operation is strictly for the transmitter module used in the Qualifier meter.

3) Please provide evidence that the antenna used with this device meets the antenna requirements for Part 15 devices. The theory of operation states that other antenna(s) can be used with this device. What antenna is it talking about, the 15.231 device or the 27MHz licensed device? Please note that no antenna can be used in a 15.231 device that has not been tested with this device. Please make this clear in the report and operational description.

R. The Qualifier meter contains an integral, PCB trace antenna that can not be changed by the end user. This can be seen in the "Tx Module Top" of internal photographs. Also, Table 1 of the test report lists the antenna as Integral (PCB). The "F" type connector provided on the unit is for connecting to the cable system and is not an antenna port.

4) Please note that other than a one or two sentence (very ambiguous) statement about the 15.231 device, the manual does not describe this unit. Please explain in your manual how this 15.231 unit fits into the system.

R. Page 2-1 (Home Qualifier System Overview) and 2-8 (System Operation) of the manual provide a complete description and use of the device. Please note that within the context of end user information this device is referred to as the Qualifier meter and sometimes as the receiver as it is evaluating the cable signals being received via the "F" type port. The transmitter within the context of the manual and end use is the Test Source Transmitter which is a separate FCC certification (FCC ID: PYN12002A).

5) Please explain how this device meets the manual / automatic shut off time requirement of 15.231.

R. When the "Q" button is depressed, the unit transmits the code one time only for a total 'on' time of approximately 37.2ms, at which point transmission is stopped.

6) Please note, the manual does not appear to have any of the Part 15 required statements. Please provide a manual with the appropriate 15.19, 15.21 statements.

R. The required statements do appear in the manual on the page immediately following the cover page of the manual. This is page 4 of 48 when viewing in Adobe Acrobat.

7) Please note that the device and label appear sufficiently large to contain the required 15.19 2-condition statement on the device. Please provide a label with this 2-condition statement. Please note that the exception in 15.19(a)(5) does not appear to apply to this device.

R. Please see exhibit “New Label.pdf”.

8) Please note, the report calls this a PYN-2202B, the label and 731 call this a PYN22002B. Please make documentation reflect the correct ID number.

R. The test report has been revised to show the correct FCC ID as PYN22002B.