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May 23, 2006

RE: Vivotech. FCC ID QA55VIVOPAY4500/ IC 5141A-VP4500

Attention: Chris Byleckie

Please find our responses to your comments on this Application below:

1. Is the adhesive used to secure the label a permanent adhesive?

Yes.
2. The Theory of Operation references an RFID radio and Antenna Driving in the block diagram. I do not see those items in the actual block diagram. Please explain.

The product is an RFID reader and has antenna driving circuitry. The radio chip drives the antenna. The radio chip is located in the bold rectangle (the antenna) of the block diagram. A product overview has been uploaded to explain the operation of the EUT. A revised block diagram has also been uploaded with the word antenna added to the upper bold rectangle.
3. FYI - The height of the antenna for magnetic measurements made below 30MHz is 1m per ANSI C63.4. It appears the antenna height was varied to maximize the signal level.

Noted: The field strength complied with the limits at 1m as shown in the test data.

Regards,

David W. Bare
Chief Technical Officer