



AUGUST 17, 2005

FEDERAL COMMUNICATIONS COMMISSION

7435 Oakland Mills Road
Columbia, MD 21046
U.S.A.

RE: FCC ID QJQ-PE-PRO-HF500

APPLICANT: SENSORS & SOFTWARE INC.

CORRESPONDENCE REFERENCE NUMBER: 29289

731 CONFIRMATION NUMBER: EA326093

Dear Sir or Madam:

The following are responses to the questions of July 29, 2005 on modular approval for the above item.

1. The transmitter module is a complete unit with electronics, antennas, shield and plastic support structure. This module was tested in compliance with Part 15 exactly as it is intended to be used.
2. The "variety of hosts" means using the unit as a UWB GPR as intended in Part 15.509. One of the variables in a GPR is the separation distance between transmitter and receiver. Another is the means of holding and moving the unit such as a handle. Variations such as this require different physical packages to be designed. The operation and use is the same, the transmitter and receiver modules are the same, the package can vary. This physical package can make the unit have commercial advantages as a distinct product.
3. The units are built into GPR products which we manufacture and which the vendor are responsible for ensuring compliance with 15.509(b). There is no intent to sell this module as a standalone product.
4. The transmitter module does not transmit except when activated by an external input signal. When the appropriate signal is received, the transmitter emits a pulse and goes dormant. The module must be designed into a complete system in order to be activated which addresses the requirements of 15.509(c).

subsurface imaging solutions

Sensors & Software Inc.

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5. We manufacture a range of GPR devices which address differing technical and commercial problems. The modular approval was requested to:
 - (a) obviate the need for redundant testing and approvals when the same unit was used in a different deployment package;
 - (b) to speed up product to market which has commercial ramifications; and
 - (c) to mitigate risk when designing new product by using a known approved unit.

Yours truly,
Sensors & Software Inc.



A. P. Annan, Ph.D., P.Eng
President