

4 June 2007

Federal Communications Commission
Authorization and Evaluation Division
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

Re: Filing for composite device for FCC ID: RFM-OWS2420-90

Dear Examiner,

We are requesting to add UNII DFS band to a currently certified device with the FCC ID: RFM-OWS2420-90. The change filed under this application is:

- Add frequency band for 5250 – 5350 MHz operation which includes DFS capability.
- Add frequency band for 5470 – 5725 MHz operation which included DFS capability.

The certified device will not be capable of 40 MHz channel operation outside of the grant conditions. The device is configured to limit operation to 20 MHz channels in the 5250 – 5350 MHz and 5470 – 5725 MHz DFS bands. These settings cannot be accessed or changed by the end user.

The certified device will not be capable of Ad-Hoc mode of operation outside of the grant conditions. Ad-Hoc operation cannot be enabled in the 5250 – 5350 MHz and 5470 – 5725 DFS Bands. Additionally, no changes have been made to the hardware or output power.

Please see below for further information:

Question: Is the request for an access point or a client device?

Answer: The device operates as an access point and client device.

Question: Does the access point operate as a master device or does the client have ad-hoc capability which requires filing with the FCC?

Answer: Yes, the access point operates as a master device.

Question: Is this for an approved software defined radio?

Answer: No

Question: Have there been any Class II permissive change filings granted?

Answer: No

Question: If not approved as a software defined radio (SDR), is this a software only change?

Answer: Yes

Also, answer the following.

Question: Describe the software upgrade process.

Answer: The software has to be installed and upgraded by the factory.

Question: Are units already sold going to be upgraded by the end user?

Answer: No

Question: Or will only new units be marketed with the software change?

Answer: No, but previously sold units can only be upgraded by the factory

Question: Will the software upgrade process require a new filing as a Software Defined Radio?

Answer: No

Question: Would the new software upgrade process meet the SDR requirements?

Answer: No

Question: Have there been any Class II permissive change filings granted?

Answer: No

Question: Are there any hardware changes?

Answer: No

Question: Are there any other changes, (e.g. an increase in output power), that would require a new identifier per 2.1043?

Answer: No

Question: Is the original filing a composite?

Answer: Yes

Question: Was the original filing a TCB grant or a FCC grant?

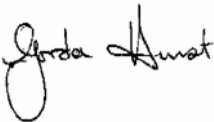
Answer: TCB grant (EMCCert Dr. Rasek GmbH)

Question: What was the date of the original grant?

Answer: FCC ID: RFM-OWS2420-90 (February 20, 2007 for Part 15C and Part 90)

Please do not hesitate to contact us if you have any questions.

Sincerely,



Gordon Hurst
President & CEO