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

January 13, 2004

RE: Luna iMonitoring

FCC ID: RIM-ICCU

Originally this application was Certified for the 15.247 device, and the Part 25 information strictly verified. In reference to your request to add the Part 25 Certification to this application, we have reviewed the additional information provided in the past few days and have a few comments.

Note: TCB's may only make changes in the first 30 days after the application was originally granted. This application was originally granted on 12/17/03. Therefore we must have all information satisfactorily addressed by 1/15/04 or we will be faced with one of the following: 1) dismissing the original grant on that day, 2) submitting a new application under a new FCC ID to cover both the 15.247 and 25 Certification requirements.

1) Does the device have a low/high setting? The Axonn theory of operation does not appear to mention a low/high setting from the information we received.

Response: Yes, it does have a high and low setting.

2) If so, please confirm that the high setting was used for testing performed as given in the U.S. Tech report issued in September 2002.
Note: It appears that Luna may possibly be using the low setting (if applicable) following the information in the application note. However test data for the power output (low setting) does not appear to have been provided in any of the reports. If Luna is using the low setting only, test data for this setting as shown in the September 2002 report for the low setting is required.

Response: Yes, the high setting was used; Luna may use the high or low setting.

3) Please provide information regarding the expected output power for the low and high setting.

Response: The high power is +22 dBm and the low power is +18 dBm. The low power adds a 4 dB attenuator.

4) We have test results from U.S. Tech regarding 2 different reports and models (G-SENS STU and AX Tracker). Portions of (antenna conducted measurements) the AX Tracker report were given to us to supplement the previous G-SENS STU report due to changes in the limits and rules. However, since the report reference different devices, please provide an attestation regarding how the data from the AX Tracker may be considered applicable to the G-SENS STU.

Response: Axonn has confirmed that the boards are considered the same. The STU modem tested and verified in 2002 is the same as designed into the AXTracker and the LUNA application. Luna is using the same antenna manufactured by Spectrum with a maximum 4 dBi gain.

5) Please confirm which setting that Luna is using (low or high setting) per the application note. Note that the power on the grant will list only the applicable power setting only. Please provide an attestation from Luna regarding which mode of operation the device will be set to during the manufacturing process by Luna, and that the end user will not have the capability of changing these settings once set.

Response: Luna wants to be able to utilize the device at the low or high setting, so no letter is necessary.

6) Since the board was previously tested by the original manufacturer (not the applicant) and a different test facility, Luna should provide a attestation to the fact that the device is being integrated from Axonn without any changes/modifications and that the original report is still considered representative of the Part 25 aspect of the device.

Response: Please refer to the attestation letter uploaded with this response.

7) The RF exposure calculations from Rheintech show the antenna used for the Part 25 transmissions as 4 dBi. From looking at the plots provided regarding antennas, the gain appears to be < 0 dBi. Please confirm the actual antenna gain for this device (in dBi) and correct the RF exposure exhibit if necessary.

Response: The antenna gain is 4 dBi; please ignore the previously provided antenna information as we are unable to confirm its relevance to this application.

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.