

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

December 16, 2003

RE: vARC Systems Inc.

FCC ID: ROE1WTX-2470

I have a few comments on this Application.

1) Please provide a Tune Up procedure for this device.

Response: No tune up procedure is necessary for this device; please refer to the revised attestation letter, uploaded as a cover letter exhibit with this response, for an explanation.

2) Please provide a conformation that only the single frequency of 2470 is requested for this transmitter. External photographs seem to indicate that four channels are available.

Response: An attestation was previously uploaded as a Cover Letter exhibit, and was entitled "2003213 vARC Systems FCC Test Report APX D Attest.pdf". A revised version of this same exhibit was uploaded with this response.

3) Please note that F3E is reserved for FM telephony only. This device transmits both FM voice and video. Please correct requested emission designator.

Response: The requested emission designator has been changed to F8W; please refer to the revised test report uploaded with this response.

4) The Circuit Description appears to indicate that this device is for use in the Part 18 ISM band. Please correct this document.

Response: Reference to ISM has been removed from the circuit description; please refer to the revised operational description uploaded with this response.

5) The rationale in 14.2 of the Test Report is incorrect. Please review.

Response: The rationale has been reviewed and changed as applicable; please refer to the revised test report uploaded with this response.

6) Please help me identify where in the instructions that NTSC audio and video pre-emphasis is required by the Applicant for proper operation.

Response: Please refer to the revised user manual uploaded with this response.

7) Please the necessary bandwidth calculations. Please indicate how "D = .25MHz" was determined without any test data to support this conclusion.

Response: Since NTSC uses a 3.58 video carrier and the test equipment was modulated 100%, the correct deviation for the video aspect is 3.58, the audio FM deviation is 250 kHz. The report has been modified to reflect this change.

8) Please indicate how the forward and reflected power was accounted for during the substitution method of transmitter spurious emission testing.

Response: It has been verified using a power splitter to measure forward and reflected power that the substitution method used was valid.

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9) Additional installation instructions and RF Exposure user warnings are required within the Manual. Please review.

Response: Please refer to the revised user manual uploaded with this response.

10) The Operational Description seems to indicate that this device may be capable of operation above the ~646 mW indicated on Form 731. Please review and comment.

Response: Please refer to the revised operational description uploaded with this response.

William H. Graff
President and Examining Engineer
<mailto:whgraff@AmericanTCB.com>

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.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.