Washington Laboratories, Ltd.

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February 17, 2004

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

RE: Comments of January 27, 2004
APPLICATION: RP2-TX3 Minerva Company

Dear Mr. Graff:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in ***bold italic***. Many responses refer you to additional exhibit(s) which has been uploaded to the application folder at the ATCB website.

Thank you for your attention. Please feel free to contact us for any additional information that you may require.

Regards,

Gregory M. Snyder
Chief EMC Engineer, Wireless/Telco Services Manager

Brian J. Dettling
Documentation Specialist WLL Project: 7905

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1) Please submit external photographs for this project. This is an FCC required Exhibit and not optional. Filings without external photographs are not certifiable.

R. The external photos submitted are as the device will be marketed. A nylon or plastic pouch is being designed to hold the unit during use. For operation the battery must be fitted and will last for approximately 2 to 3 hours.

2) If this device is to qualify under the Modular Approval requirements of DA-001407 please submit a modular approval request letter.

R. The device is not considered to be a modular approval.

3) The Test Report presents timing information that is not particularly clear. Only the 220 microsecond off-time measurement is shown. A typical on-time measurement is usually required as well. Please provide this measurement and then extrapolate to 100msec as required.

R. The on-time pulse width measurement has been incorporated into the test report and duty cycle correction calculation.

4) The radiated emissions at the fundamental are unclear. Your data table shows quasi-peak measurements. But it is not clear how or if the data shown incorporates duty cycle correction into the final value for comparison to the limits. In addition, please note that "double dipping" is not allowed – either quasi-peak measurements can be used, or peak values de-rated according to the duty cycle correction formula – but both cannot be combined. FYI: An example calculation would be helpful.

R. The fundamental was measured using a quasi-peak measurement. Duty cycle correction was not added to these measurements. Additional text in the "Test Procedure" section of the test report has been added to better explain this.