



December 8, 2008

Federal Communications Commission

To Whom It May Concern:

Please be advised that Innovative Wireless Technologies, Inc. is requesting Part 15.247 Unlicensed Digital Modulation approval for its Gateway Node, IWT P/N: FAP2210-001 and Fixed Mesh Node, IWT P/N: FAP4210-001, both to have FCC ID: SP8-FAP2210-001. The below statements outline Innovative Wireless Technologies' responses to part 15.247 concerning Digital Modulation compliance.

1. The Gateway Node (GWN) and Fixed Mesh Node (FMN) are designed specifically for and marketed for mine safety applications.
2. The GWN and FMN are electrically and mechanically identical except the FMN does not have an external Ethernet interface.
3. The GWN and FMN are professionally installed at the mine site and only use antennas from an IWT approved list that comply with FCC EIRP limits.
4. Nodes installed external to mine tunnels are limited to 13dBm output power and use antennas with less than 6dBi gain.
5. The GWN and FMN are powered by battery and an AC-to-DC power supply compliant with section §15.207.
6. The GWN has been tested by Flom Test Labs for Part 15 emissions compliance. The EUT was tested as an AC line powered intentional radiator complying with §15.247 and §15.207.
7. The GWN and FMN will have the FCC ID label with ID number and modification warnings located next to the RF connector.
8. The user/installation manual for the GWN/FMN outline the proper usage of the EUT and will be submitted with the application for equipment authorization.
9. The GWN/FMN will not be operated in a manner as described by Table 1 of §1.1307(b)(1) that would expose the public to energy levels in excess of the Commission's guidelines.

Innovative Wireless Technologies, Inc. certifies that the above statements are true to the best of our knowledge. Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert Bruce Sanders', is written over a horizontal line.

Robert Bruce Sanders
RF Engineer
Innovative Wireless Technologies, Inc.