



10/1/2006

Mr. David Waitt
ATCB

RE: Nivis LLC

FCC ID: **SQB-NIVISNRD20101 (ATCB 3900)**

Mr. Waitt,

Thank you for your comments in your letter of August 22, 2006. Below is my response to your comments on this application. I have included your original comments in my response.

After a review of the submitted information, I have a few comments on the above referenced Application. Depending on your responses, kindly understand there may be additional comments.

Additionally, if some of the issues / concerns below are not clear, please do not hesitate to email me for clarification.

1: The request for confidentiality letter is requesting confidentiality for the user manual. Typically user manuals are not held confidential without prior approval from the FCC. If you wish the manual to be confidential until product release, you may request temporary confidentiality. (see the ATCB web site for more on temp confidentiality <http://www.atcb.com/publicdocs/Memo-Short-Term-Vs-Standard-Confidentiality-031306.pdf>) Note that the confidentiality request letter in the test report has removed the reference to the user manual. Please provide a separate exhibit with the reference to the user manual removed.

Due to the nature of information within the Integrators Guide, it is requested that you place this document under confidential status, as has been done in previous applications.

2 Please provide photos of the unit with all the shields removed.

Internal Photos corrected and uploaded.

3 MPE estimate refers to 27.52 dBm EIRP, Calculation indicates 22.59dBm EIRP (Though the value in mW is correct) Please correct.

Corrected and Uploaded.

4 The MPE estimate must take into the account the maximum allowed antenna gain that will be allowed to be used with the module. Please revise the MPE estimate to include antenna gain.

After request for confirmation, Nivis notified us that the antenna is a 2 dBi gain antenna, not Unity gain (0 dBi). The report sections have been corrected to represent that all data was taken using the 2dBi gain antenna, including Antenna Description and MPE estimate.

5 Please provide a data sheet for the antenna that is to be approved for use with this module.

Uploaded

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PH: 770-740-0717 Fax: 770-740-1508
www.ustech-lab.com

6: Please provide data to support the average time of occupancy test results.

It is Nivis' intention to run the duty cycle at 400ms/20s. Do you require a letter confirming this?

7: Please remove section 2.17, Page 111 since it is not required and conflicts with the statements in section 2.14 (page 104 - 107)

Section 2.17 was corrected to reflect the results in 2.14

8 Please provide a sample hopping sequence for this device or provide the algorithm that outlines how the hopping sequence is generated.

The hopping sequence/channel assignment is listed under upload "06-0105.Frequency Hop Table". Looking at it, I realize that it may be confusing since Nivis follows a sequential Hop sequence using the channel numbers (Channel 0, 1, 2, 3, 4).

Therefore, I have uploaded another sequence which compares the channel order to frequency assignment. ("06-0105.Channel/Frequency Hop Sequence").

I have noted that channels 1-2 and 32-33 are sequential frequencies. Is this a problem?

9 Please confirm that the intended receiver hops in sync with the transmitter.

This statement is confirmation that the intended receiver hops in sync with the transmitter.

10 Please provide an exhibit showing where the FCC label will be located on the device.

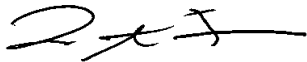
The label will be located on the shielding. An exhibit has been uploaded.

FYI: While compliance does not appear to be an issue, in the future please measure the 20 dB BW to the widest 20dB points (See Low and mid channel vs High channel measurement)

Noted.

Please contact me with any further questions.

Sincerely,



Louis A. Feudi
Vice President of Operations and Engineering