Washington Laboratories, Ltd.

7560 LINDBERGH DRIVE
GAITHERSBURG, MD 20879
(301) 417 – 0220 FAX # (301) 417 - 9069

August 29, 2006

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

RE: Comments of August 17, 2006
APPLICATION: T3S-PPC-1000-E ELVA-1 Ltd.

Dear Mr. Johnson:

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,

Michael Violette
President

Brian J. Dettling
Documentation Specialist WLL Project: 9096

1) The labeling exhibit shows the 2 part FCC statement from 15.19(a)(3). However it would appear that 15.19(a)(1) may be more appropriate. Please review.

R. The label has been revised. Please see "ELVA-1 Label Location Rev 2".

2) It appears that radiated tests were performed with antenna attached, but multiple antennas are being approved. Please explain.

R. The question appears to reference the case radiated spurious emissions testing. Radiated emissions testing was performed at Washington Laboratories, while conducted emissions testing was performed at the customer location. The equipment that was provided to WL was configured with a representative antenna. The device may use any of the antennas in the manual. As case radiated spurs are the subject of the radiated emissions requirements, a representative antenna was attached to provide a matched load.

3) The manual appears to list 5 antennas, but the information provided to show compliance to 101.115 is only for 3 antennas. It appears that 2 antennas may not meet the minimum requirements of 101.115. Please review/explain/correct as necessary.

R. The 100 and 200 mm antennas were inserted for European markets. They will not be supplied to the United States and will be removed from the manual. See "ELVA-1 Users Manual Antenna Section.pdf"

4) Please explain an emissions designator of 1400M3X1D. It appears according to 2.202 that this should be 1G36X1D. Please review/correct/comment as necessary.

R. A misinterpretation of the naming criteria in 2.202. We will advise the client.

5) Please provide an appropriate MPE exhibit for this device showing the calculations supported as given in the supplemental manual.

R. The device is not subject to MPE requirements, labeling or other requirements. See 1.1307, Table 1 for operation in the 70/80/90 GHz Bands. Requirements exist for devices with building-mounted antennas and EIRP > 1640 W (32dBW). The maximum EIRP for this system is 30dBm or 0dBW.

6) The limit for Table 10 appears to assume that the limit is a received field strength of -13 dBm. The limit is actually for the substitution method. My calculations show that using far field equations, that the limit at 1 meter for a transmit power of -13 dBm into a dipole would be 93.9 dBuV/m. Please review/ explain/ comment or provide sample calculations as necessary.

R. The limit is really fictitious as the measurement distance was 0 cm. A limit of 10cm was selected for reference purposes only as a limit at 0 cm would be infinite. Our calculations yielded a 1 meter equivalent E-field of 97 dBuV/m and a 10 cm limit would be 20dB higher or 117dBuV/m (and thus reported). If we were to take the calculation yielding 93.9dBuV/m and extrapolate to 10cm, then the 10cm limit would be 113.9dBuV/m and the noise floor emissions are still compliant at the 0cm test distance. All measurements are at the noise floor of the system. The intent of the measurement is to demonstrate that the spurious emissions are nil.

7) FYI - sample grant notes….Power output listed is EIRP. This device operates with a ___ dBi parabolic antenna as an integral part of this transmitter. It is to be fix-mounted on outdoor permanent structures and

RF exposure compliance must be addressed at the time of licensing, including co-location requirements of 1.1307(b)(3). An RF exposure label, as described in the filing, should be placed on the transceiver, visible to all persons in the vicinity of the transmitter exposed to the antenna, for satisfying RF exposure requirements.

R. Acknowledged and conveyed to the client.