

28 June 2006

American TCB  
6731 Whittier Avenue  
McLean VA 22101

RE: Revolabs  
Joel Schneider Response to 26 June 2006 Comments

FCC ID: FCC ID T5V01EXEMIC / IC:6455A-01EVEMIC

1. ATCB Comments: Please note that this device appears to be able to be used anywhere and would therefore appear to be noncoordinatable. Please provide evidence as to how this device meets 15.307 (a) through (h).

**RESPONSE:** Public Notice DA 05-1005 April 4, 2005 - need for coordination no longer exists, eliminates 15.307.

2. ATCB Comments: Please explain how this device meets the definition of an Unlicensed PCS device per 15.301, 15.303 and 15.307 of 47CFR.

**RESPONSE:** 15.303(g) - Personal Communications Service (PCS) Devices [Unlicensed] - Intentional radiators operating in the frequency band 1920-1930 MHz that provide a wide array of mobile and ancillary fixed communication services to the individuals and businesses.

3. ATCB Comments: Please provide the required UTAM letter per (15.307b).

**RESPONSE:** Revolab's UTAM letter have been uploaded..

4. ATCB Comments: Please note that 2.1093 states, "Portable devices that operate in the Cellular Radiotelephone Service, the Personal Communications Service....

**RESPONSE:** 2.1093(c) also states that application must contain a statement confirming compliance with the limits specified in paragraph (d) of this section, technical information showing the basis for this statement must be submitted. PBWDJG08053T, for example, is similar device already granted, did not require SAR testing. I agree, the device is not exempt from rf evaluation, but do not believe SAR testing is required – a revised RF Exposure letter has been uploaded.

5. ATCB Comments: Please provide the manual for this device.

**RESPONSE:** This comment was addressed previously and the manual has been uploaded.

6. ATCB Comments: Please explain how the device meets the requirements of 15.323 (c)

**RESPONSE:** The 15.323 (c) test report has been uploaded.

7. ATCB Comments: Please provide the required test report. Please ensure that all aspects of 15 subpart D are fully addressed.

**RESPONSE:** This comment was addressed previously and the test report has been uploaded.

7. ATCB Comments: Please note that a more complete review cannot be performed until all missing information is provided.

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**RESPONSE:** Please let us know if anything else is needed to continue with your review.

The above referenced documents have been uploaded to the website at the same time as this response.

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