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September 7, 2005

Mr. Dennis Ward
American Telecommunications Certification Body Inc.
6731 Whittier Ave
McLean, VA 22101

RE: Comments of September 2, 2005
APPLICATION: TDOAVIACOM1 MB Martin and Company

Dear Mr. Ward:

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: 8843

1) Please explain why ANSI C63.4 2003 is listed as a test method in the report.

R. The reference to ANSI C63.4 is in error and has been removed from the revised test report.

2) Please note that part 87.131 lists many classes of stations. The report states the device is a ground based application while the manual states it is an air-to-ground system. Please clarify.

R. The unit is for ground based applications only. The statement in the manual is to indicate that the unit is used to communicate to aircraft in flight.

3) On page 13 of the test report the 100Hz modulation instantly drops at about 400mv and stays at 0. Is this due to the limiter/filter, or is this a measurement problem. Please explain.

R. This is due to the limiter. This was noted during the measurement and therefore the setup and rechecks of this data was used to verify the results.

4) Please note that on the modulation deviation plot on page 13 of the report the vertical axis is labeled “% **Amplitude Modulation (KHz)**”. Please explain the (kHz) notation in relation to %.

R. The “kHz” is an error and has been removed from the revised test report.

5) Please complete the frequency tolerance section of the 731.

R. The 731 has been amended to show the frequency tolerance.

6) Please note that the measured OBW of the device appears to be 5.83kHz. The emissions designator shown on the 731 is 6K00A3E. Please note that for a device with an authorized bandwidth of 8.33kHz the emissions designator in the table in 80.137(a) states 5K60A3E. The 6K00A3E applies to the device just above the 8.33kHz authorized BW device which would have an authorized bandwidth mentioned in note \3\ of 80.137(a). Please explain why you are using the emissions designator for a note \3\ device when the authorized bandwidth referenced in the report is 8.33kHz.

R. The emission designator has been corrected to the 5K60A3E designation. The test report and 731 have also been updated to show the correct emission designator.