

RE: FCC ID TFY0605AXM0367

Please find enclosed responses to your letter of July 2, 2005

1.) Please supply a copy of the Label to be used with device.

[A:Uploaded to the website](#)

2.) Please supply External Photographs as required by FCC rules.

[A: This device is not marketed with an enclosure. The photos submitted show the EUT as it is marketed.](#)

3.) Will this device be used as a Module? If so, then a letter as described in DA 00-1407 must be supplied.

[A: This device is not a modular device.](#)

4.) Will a Canadian filing occur with this submission? If so, then a Canada application form must be submitted to American TCB. You can find a current application form at our website.

[A: Yes. We will upload the IC application in the next week](#)

5.) The Block Diagram supplied is not sufficient. Please review 47CFR 2.1033(b)(5) add make appropriate modifications.

[A: Revised block diagram uploaded to website](#)

6.) Test Setup photographs are missing and are required for all Part 15 submissions. Please provide.

[A: The photos were uploaded to the website](#)

7.) An RF Exposure Exhibit is normally required for all spread spectrum devices operation (see 15.247(b)(5)). Please provide this required information.

[A: Please see uploaded RF exposure exhibit](#)

8.) Please provide a required Operational Description for this device.

[A: Operational description uploaded to website](#)

9.) Several Exhibits were marked for "Short Term Confidentiality" but the required letter has not been submitted. Does STC apply to any Exhibits in this filing for FCC?

[A:Omit request for Short term confidentiality](#)

10.) Required regulatory statements of 15.21 are not found in the Manual. In addition, there are cautions against usage in a residential environment which infers this device is designed as a Class A apparatus. All Part 15C Intentional Radiators must meet the requirements of 15.209 and 15.207 (Class B limits). In addition, if this device is capable of connecting to a computer, then it must meet the requirements for Computer Peripherals. This means either Part 15B Certification or Declaration of Conformity would apply. Please review.

[A: As per our telephone conversation, this product is marketed to OEM integrators, not the general public. It will therefore be used only in Class A environments. As per the test report this device does meet all of the requirements of 15.207 and 15.209. The manual has been updated to include the correct statements](#)

11.) The Manual appears to indicate that different clock frequencies/crystals can be used to 80MHz (see pp. 4 and 11). Is my reading correct? Was this device checked when clocking at different rates? If my assumption is incorrect, please accept my apologies.

[A: Axiom manufacturing has removed this reference from the manual](#)

12.) Please provide photographs and descriptions of all antennas to be used with this device. Also please provide descriptions of the associated antenna connectors.

[A: This device uses an integral antenna](#)

13.) The Manual is missing required regulatory RF Exposure statements. FYI: Because of the very low power associated with this device, you may find it easier to seek approval under 15.249 instead of 15.247. In that way most questions about RF Exposure will simply fall away from this submission.

[A: Manual has been uploaded with statements – \(see v3\)](#)

William H. Graff

President and Director of Engineering

[mailto: whgraff@AmericanTCB.com](mailto:whgraff@AmericanTCB.com)

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination.

Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.