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American TCB

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RE: Way Systems. FCC ID: VLNWAY5000
Attention: Timothy R. Johnson

Please find our responses to your comments on this application below:

1) FYI...Your response 2 mentions class B. Note that over the years the FCC has said that labeling must meet intent. If the intent is to state that the device meets Class B – then it must be labeled as such. The only flexibility of this that I am aware of is if the device is cited to be a Class A device that has met with Class B limits. However if the manual and/or marketing material strictly site Class B with no explanation – it needs to be treated as Class B. Additionally the FCC does not want an obvious class A device (mainframe system) to be labeled with Class B even if it meets it. Therefore it appears the best course of action would be to cite that the device is considered a Class A device – but has met with class B levels.

[FYI...The intent here is that the product comply with the Class B limits. It is not a personal computer peripheral and therefore is subject to verification per the FCC part 15 rules.](#)

2) In the Part 22 report, spurious data run 1A, the last entry appears to have typos. Note that this entry was ok in the original report provided.

[The typos have been corrected. Revised report has been uploaded.](#)

3) Regarding voltage stability. If device shuts down – this is good to know and should be documented as such. However additionally frequency error should be measured just prior to shutdown to show that the range from nominal down to the measured level stays in compliance. This information does not appear to be provided.

[The test data and report have been reworded to address your question. Note: The unit did not change frequency with voltage change before shutting down. Revised reports have been uploaded.](#)

Regards,

David W. Bare
CTO