Testing Tomorrow's Technology

August 25, 2009

Timothy R. Johnson
ATCB

RE:ATCB 007791
Innovative Broadband, Inc.
FCC ID: XFH-05000006
ATCB: 007791
Response to Comments letter dated August 25, 2009

After a review of the submitted information, I have a few comments on the above referenced Application. Depending on your responses, kindly understand there may be additional comments.

1) The updated 731 form cites a frequency range of 902 – 927. Please note that 902 is not possible, the device would not be able to meet band edge requirements as the frequency is right on the band edge itself. Additionally, the test report appears to show 903 MHz – 927 (Bandwidth tests). However generally we are concerned with the nominal expected values. However note that the information supplied does not appear to provide a channel list of operation (i.e. typically given in the operational description), lowest/highest channels or similar. Please clarify and correct the 731 form as necessary. Ideally the operational description should be updated to clarify this as well. Please consider updating the operational description as well.

Form 731 has been corrected and an updated Operational Description has been uploaded.

2) The 731 Equipment type is incorrect. This should be DTS given the test report. Please correct.

Form 731 been corrected.

3) The output power on the 731 form should be 0.010 W given the current test report. Please correct.

Form 731 has been corrected.

4) Given the device is now being submitted under 15.247, kindly provide an appropriate MPE exhibit. Additionally, please note that the test report shows gain of antenna of > 2 dBi. MPE should utilize the maximum gain expected.

Testing Tomorrow's Technology

The correct antenna gain is <=2 dBi. The new value has been corrected and updated. Section 2.16 has been added to the report to provide the calculation and Maximum Public Exposure.

5) Were modifications necessary to meet the 6 dB requirement since the last test report? Please comment. If so, kindly note that an updated schematic may be necessary, as well as the test report cites that no modifications were necessary.

The only modification that has applied to the EUT was a software change. Since there was no Hardware change, a new schematic is not applicable The modification part of report has been updated.

6) The user's manual should provide a no-colocation statement to the user for RF exposure purposes. Please update. An example would be the antenna(s) used for this transmitter must be installed to provide a separation distance of at least 20 cm from all persons and must not be co-located or operating in conjunction with any other antenna or transmitter.

The user's manual has been updated and uploaded.

7) Please explain the QP measurement for the bandedge. Typically this is a peak measurement.

Measurements were re-made and the report has been updated with peak measurement data.

8) To ensure compliance with the DTS requirements, please comment on the type of modulation the device uses.

This device uses DTS with GFSK Modulation type.

9) Given the antenna is removable, compliance should also be measured RF conducted for the following requirements: RF conducted emission levels show compliance with the 20 dBc limit, both at the band edges, and for all other spurious emissions through the 10th harmonic, or 40 GHz (whichever is lower)?

Section 2.10 has been added to the report to cover these requirements.

Best regards,

Sandi McEnery
Manager
(Agent for Innovative Broadband)

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