



Washington Laboratories, Ltd.

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August 21, 2007

Mr. Rich Fabina
American Telecommunications Certification Body Inc.
6731 Whittier Ave
McLean, VA 22101

RE: Comments of July 11, 2007
APPLICATION: AXYATX039 Airtronics, Inc.

Dear Mr. Fabina:

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,

Steven D. Koster
EMC Operations Manager

Brian J. Dettling
Documentation Specialist

WLL Project: 9601

1) The operational description for this transmitter contained in the additional information folder for this application is for a direct sequence transmitter. The test report in this application is for a frequency hopping transmitter. Obviously one of them is wrong. Either I need a new test report or a new operational description for this application. (I assume the operational description is wrong).

R. An improved Operational Description has been supplied by the client. Please see “System Description MX-3 FHSS”.

2) If you provide an operational description, make sure it includes the following:

- (a) A brief description of the circuit functions of the device along with a statement describing how the device operates.
- (b) Describe how this transmitter meets the definition of a frequency hopping spread spectrum system, found in Section 2.1 of the FCC Rules, based on the technical description.

- (c) Describe how the hopping sequence is generated. Provide an example of the hopping sequence channels, in order to demonstrate that the sequence meets the pseudorandom requirement specified in the definition of a frequency hopping spread spectrum system.
- (d) Describe how this transmitter meets the requirement that each of its hopping channels is used equally on average (e.g., that each new transmission event begins on the next channel in the hopping sequence after the final channel used in the previous transmission event).
- (e) Describe how the associated receiver complies with the requirement that its input bandwidth (either RF or IF) matches the bandwidth of the transmitted signal.
- (f) Describe how the associated receiver has the ability to shift frequencies in synchronization with the transmitted signals.
- (g) If this transmitter adapts its channel hop set to avoid channel collisions, describe how it complies with Section 15.247(h) of the FCC Rules.

R. Please see “System Description MX-3 FHSS”.

3) The FCC application process requires separate exhibits to be uploaded to the FCC Database. You have combined several exhibits into one in the additional information folder in this application. Please provide individual exhibits of each of the following: (a) User's manual exhibit - A copy of the installation and operating instructions to be furnished the user. Make sure this copy contains the information required by Section 15.21 and any specific operating instructions and/or caution statements that are necessary in order for the device to comply with the RF exposure limits. (b) Schematic diagram exhibit - A schematic diagram of the transmitter. Make sure the schematic is in English. (c) Block diagram exhibit - A block diagram showing the frequency of all oscillators in the device. None of the block diagrams in the additional information folder have oscillators on them.

R. Item (a) has been addressed in the exhibit “ATX039 Users Manual”. Items (b): Please see “circuit_diagram FHSS”. Item (c): Please see “Block_Diagram FHSS”.

4) There is no model number displayed on the IC label as required by Section 5.2 of RSS-Gen Issue 2. The model number of this device is MX-3FHSS. Please submit an amended IC label.

R. The label has been corrected. Please see “646A00451Ctext”.

5) The statement required by Section 15.19(a)(3) of the FCC Rules cannot be placed on the battery compartment cover where it could be lost with the detachable cover. Neither the FCC ID label nor the compliance statement from Section 15.19 may be placed on the battery compartment cover. Please place this statement in the user's manual to avoid this problem.

R. The “two-part” statement is not placed on the battery compartment cover. It is shown placed on the side of the unit at the lower base.

6) The application form indicates that there is confidential material filed in this application but no letter requesting confidentiality has been submitted. Please clear up this discrepancy by either filing a letter requesting confidentiality of specific exhibits or amending the application form to delete the notice that confidentiality is being requested.

R. A cover letter requesting confidentiality has been uploaded. Please see “ATX039 Cover Letter – RFC.”

7) Washington Laboratories is not listed on the IC Database as a test lab. Until this matter is corrected, an IC Certificate cannot be issued. You need to contact IC to determine what has happened to the IC listing of Washington Laboratories.

R. The Industry Canada site accreditation has been renewed.

8) The test report for this device cites the wrong version of ANSI C63.4. The correct version is the 2003 version not the 2001 version of C63.4. Please amend the test report accordingly.

R. The report has been corrected.