1) The previous response to item 6 mentions models IONM80/19 and IONM9/17. Labels still do not support this. It appears the labels show ION-M90/17P and ION-M80-85/19P. IC expects labels to match as Certified. Please explain, correct, review, etc.

We have submitted revised application forms and labels to reflect the desired model numbers. We are opening a separate submission for the extension unit. The existing file will apply to the Main Unit.

2) It was noted that the main schematic, 1900 MHz schematics, control schematic 1900 – 2100, control schematic 800-900 MHz, and 800 – 900 MHz schematic only contain reference designators and do not contain appropriate values. Please correct.

We have uploaded Bills of Materials for these products with the component values included.

3) Previous comment 10) was actually in relation to any master unit. Please comment.

We identify both the Main Unit and the Extension Unit as "Remote" units as described on page 2 of the FCC "Amplifier and Booster Guidance" document. We do not believe the fiber host unit requires FCC ID number since it connects directly to the BTS via coax rather than through an antenna. Since the fiber host unit does not require FCC ID number per the guidance document (page 3 – "reminder sheet items", we do not believe that the referenced statement is appropriate.

4) Upon further discussion internally, in order to meet the amplifier, repeater, booster requirements it seems that the main unit should be certified under one ID, and the extension unit certified under it's own FCC ID with grant notes that reference for use with the main unit's ID. Please see attachment. This is especially true if the extension unit is not always present as given in your response. The FCC has given multiple interpretations over the past few years that doesn't allow for a single ID to cover the device when TX components are removed or added. If the extension unit was ALWAYS present with the main unit, it may be considered a stretch but may be possible to do under a single FCC ID. If you desire we will be glad to approach the FCC on this specific instance, but currently it appears this should be 2 FCC ID's.

We have provided a corrected Form 731 for the Main unit and have created a new and separate application for the extension unit.

5) Your response mentions that the rf exposure is addressed at the time of licensing. This is not necessarily always the case. For instance see 90.219(e). Additionally, given the antenna gain and output power, it is not certain how the limitations of 90.219 are met.

While these devices do not require a new FCC license they do impact the existing license of the BTS installation and so any change that may impact rf exposure must be reported to FCC when the distribution system is installed. The manufacturer is obligated to provide clear information to the installer/user to insure that the installer will install the device to be within the FCC regulations for RF Exposure. We have provided updated install manuals that specifically address the minimum separation distance and antenna gain for all of the intended installation scenarios. The manufacturer provides for two installation configurations – outdoor fixed and indoor fixed. An outdoor fixed installation would have the antenna mounted on an outdoor permanent structure such as a tower or the side of a building. An indoor fixed installation has the antenna fix mounted to a permanent structure indoors. A different minimum separation distance is required for each scenario. We have provided MPE reports for each configuration.

6) Response to previous comment 20 implies that a corrected IC report was supplied. This does not appear to be received.
We have uploaded a corrected IC application and test reports.