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American TCB

November 13, 2006

RE: Horizon Hobby. FCC ID: BRWDSSRX00 Attention: David Waitt

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

1 It appears perhaps this should be a modular certification request. It appears the transmitter device is installed in a remote control unit and the transmitter device would receive command signals to be transmitted from the "host". Please provide justification for this NOT being a modular certification request (or a LMA). If a modular certification is required, please provide appropriate modular certification documents. (how does the device meet the requirements of a module, host labeling instructions to the user...)

This application is for the device pictured on page 9 and 10 of the user manual. The "receiver" actually transmits telemetry information, so Horizon Hobby needed to get a separate device approval (not modular).

2 Based on the number of channels, the approximate BW and transmit power it appears this may be a Bluetooth device. Please confirm. If so, please provide frequency hopping documentation (dwell time, number of channels, ...)

The device is classed a s Direct Sequence system. The data rate is only 15kbps spread over a 1.5MHz bandwitdth. There are 64 chips/bit. The processing gain is 18dB.

3 The wire antenna shown in the external photos appears different from the antenna shown in the user manual on pages 5 and 6. Please elaborate. Is the wire antenna inside of the sleeve shown in the user manual?

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4 Please provide additional internal photos. The photos provide appear to be a little out of focus. Additional internal photos have been uploaded.

Regards,

David Guidotti Senior Documentation Specialist