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December 11, 2008

Mr. Tim Johnson  
American Telecommunications Certification Body Inc.  
6731 Whittier Ave  
McLean, VA 22101

RE:                   Comments of November 17, 2008  
APPLICATION:      Control Chief Corporation FCC ID: CBF-ADVLJ45-450

Dear Mr. Johnson:

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

WLL Project: 10624

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1) Please provide RSS-102 Annex A/B as applicable.

***R. An RSS-102 Annex A/B has been uploaded***

2) From the PC cover letter the changes appear to suggest only the enclosure. However external photos show that the controls appear different as well. Given the changes and possible differences, kindly provide internal photographs to support that the TX portion of the device has not changed.

***R. The transmitter board has not changes, I have provided photos of the board for your review.***

3) Test report cites maximum output power is 9. Please explain what this means. No units were given, and this doesn't appear to co-relate to anticipated values.

***R. The correct value was placed in the report with the correct units, see corrected report.***

4) Test Report cites  $\frac{1}{4}$  wave whip internal antenna. It does not appear the antenna is a whip antenna. Please explain.

***R. The report has been changes to reflect the correct antenna type, see updated report.***

5) Because output power must be listed as ERP for this device by FCC requirements, and several recent interpretations on other projects have not allowed for calculation of this value but require measured ERP (substitution method), measured EIRP information needs to be provided. The conducted values are sufficient for showing a PC is allowed, but if EIRP varies too much, then this will required to be listed as a new line item and additional grant notes may be necessary. Kindly note if the device is portable, 3 axis may be necessary to obtain worst-case, especially if enclosure is now metal and only a small area allows antenna emissions. Please provide.

***R. EIRP Measurements have been added to the test report. The original unit did not have the EIRP information recorded and the grantee wants to use the original unit as well. Will a grant note with the new EIRP limit their ability to use the original device?***

6) Section 4.3 appears to apply Part 15. This is a Part 90 licensed device and subject to substitution methods and limits different than applied (please see previous test report section 4.4). Additionally, testing did not appear to show anything above the fundamental frequencies. Please review/explain as necessary.

***R. The substitution measurements have been incorporated into the report, see updated report.***

7) Safe distance should not be calculate for < 20 cm. Instead something similar to the provided example document should be provided. Note that MPE is EIRP, while power above is ERP.

***R. MPE Statement has been uploaded.***

8) Test sections do not reference appropriate RSS sections as well. Please update or provide appropriate cross reference for this report.

***R. The test report has been updated with the RSS references, see updated test report.***