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April 28, 2008

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

RE:                   Comments of April 25, 2008  
APPLICATION:       CBF-ADVLF45-450 Control Chief

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

*Brian J. Dettling*  
Documentation Specialist

WLL Project: 9805-9806

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1) Comment 8 referenced an updated manual which does not appear to be received. Please review.

***R. “LJ45-450 User Manual revised” has now been uploaded. See page 5.***

2) Table of frequency information contains frequencies information that is confusing. It appears the frequencies may be for multiple model devices. Which are applicable? Is it only model 450X? If so, then it appears this device would be listed as 452.3250 – 452.9875, 456.1875 – 462.5124, and 467.2125 – 467.9375 MHz. Please confirm/ explain.

***R. Please see “94-00-0-003\_C”. Note the column “LJ”. The cells in that column are grey if the associated frequency is unavailable for the LJ-45 device, and are white if the associated frequency can be used.***

3) Please explain use of EIA/TIA 603B. This standard is outdated and replaced with EIA/TIA 603 C.

Please see:

Land Mobile FM or PM Communications Equipment Measurement and Performance Standards  
(ANSI/TIA-603-B-2002)(Superseded by TIA-603-C-2004)

<http://www.tiaonline.org/standards/catalog/> Then enter "603" and press search

Note: Page 3 of the test report also references ANSI/TIA/EIA-603-93.

*R. Please see "LJ45-450 Test Report rev 1". TIA 603B was used because that is what is listed at the FCC website as a measurement procedure. TIA 603C is not there. It does caution that the list is not all inclusive, but I assumed that the latest procedure would be listed. I have a copy of the TIA 603C, but could not find any reference to this test procedure for FCC testing. Please advise as to where the procedure is called out for future reference.*

4) Regarding RF exposure, FCC would require SAR testing for when power is > 60/freq(GHz). This equates to around 120 mW. FCC considers worse case radiated or conducted. Unfortunately information regarding the gain of the antenna or the EIRP of this device is not provided. Please provide.

*R. Please see "ANT-458-SP\_Data\_Sheet". As you can see from the antenna data sheet, the manufacturer has estimated the antenna gain at -4dBi. This will put the EIRP well below the SAR testing requirements.*