



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

May 30, 2007

RE: Electronic Systems Technology, Inc.

FCC: ENPESTEEM195ES

After a review of the submitted information, I have a few comments on the above referenced Application. Depending on your responses, kindly understand there may be additional comments.

- 1) Please note that it has taken some time to absorb how the operation of this system occurs given the information provided. While I understand that the spirit of the intent has been applied, please note that TCB's are not allowed to make engineering judgement of such issues where they do not directly meet the FCC's requirements/rules. The FCC requires that we clarify such issues using their KDB system. We have submitted an inquiry to the FCC on this issue for your particular approach and will provide a response when it is received (usually in about 3 days). However I would like to note that we have had other applications in the past with similar types of design where we have asked the FCC about and they have responded with:

No it will not be acceptable since the device does not meet the requirement of hopping equally on average when it obviously uses XXX frequencies more than the rest. There are plenty of ways to synchronize the system you do not absolutely need a particular hopping pattern to do so.

While it is possible that the FCC allows this particular design, given previous experience with these types of devices, we find this unlikely and expect a response similar to the above. In this event, Electronic Systems Technology, Inc. should be prepared to either adjust their design as mentioned in their response (which would require appropriate updated exhibits for theory for various aspects of the design and any affected tests) or should be prepared to continue discussions with the FCC regarding their approach or seek appropriate council with an appropriate FCC experienced council who can approach the FCC. Note that in recent years we have seen the FCC respond more favorably to direct manufacturer inquiries and the use of appropriate council (contrary to a few years ago where the TCB's inquiries held more weight).

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Examining Engineer

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.

