

October 24, 2003

RE: TRW Inc.

FCC ID: GQ4-22T

The following is in response to comments made on the above referenced Application.

General

1) Since the device may be mounted in any direction, please confirm that positioning of the device was investigated (i.e. X, Y, Z) in order to obtain worst case measurements at 3 meter. If not, then investigation of the device in X, Y, Z should be performed. Note that only worst case results need to be submitted. This is to ensure that worst case propagation from the device was not located in the Z-axis from the position shown in the test photos.

The device was tested for all principle orientations, and the worst case emissions were reported. Since only one test setup photo is taken, we do not show the device in all orientations, as tested.

2) The limits in table 5.1 are correct for measurements up through 411 kHz. However, the limits for > 411 kHz are actually in uV/m instead of dBuV/m and therefore affects the results. Please correct.

Sorry for the typo. A revised Test Report Exhibit has been uploaded including the corrected limit.

3) It is not certain if the labeling should be placed on the device or the main host unit (control module). It is not certain the device by itself is considered the TX or if this is simply the antenna and amplifier circuit. If the initiators are not considered fully as the TX, then the label should be applied to the main unit. Please provide a justification as to how the unit is labeled.

Justification is as follows. TRW wants to place the labels as indicated primarily for identification, marketing, and inventory reasons. Since the RX is entirely contained in the control module, its label will be on main module. For the LF transmitter, the circuitry is split between the control module and the "initiator" module. Here, TRW requests that the label be placed on the "initiator" module because, in the users/manufacturers view, the initiator is this module and the transmitting coil is contained therein.

Essentially, the labels are placed as such to avoid confusion and provide a means of identifying the RX and LF TX separately to the customer. Both modules will be sold together as part of the same model, 39360-S3V-A0.