



Dennis Ward
ATCB
Response to comment letter dated 7/13/2004

Dennis,

Below are our responses.

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

FCC

1. Please note that while test setup photos are not required for licensed devices, when they are provided they should follow the prescribed setup exhibit routines. Please note that the setup photos shown in the latest revised test reports are not the same as shown in the separate test setup photos exhibit. Please make documentation consistent. Please provide a separate exhibit of the actual test setup photos.

Corrected photos have been updated.

2. Please note that GHH equipment code is specifically for a Part 80 VHF Hand Held GMDSS Transmitter. As this device operates under Part 22, Part 74 and Part 90, this equipment code designation is not adequate. Please provide the correct equipment code. Alternately please explain how GHH equipment code fits this device.

After discussion with Bill, and removal of the part 80 request, we have modified the form 731 to indicate TNF (Non Broadcast Transmitter held to face)

3. FYI - Please note that the modified report only partially address rf exposure. Please note that the reason SAR is not required is not simply because of the exclusion list but because the 50% duty cycle power is under the level at which SAR is required for controlled environment devices- i.e 50% duty cycle power = 3.075W. Controlled environment SAR would be necessary when the 50% duty cycle power = $900/.174$ or 5.2W. It is this explanation that should be provided in the report.

Thank you for the clarification. The report has been modified to include this explanation.

IC comments responses will be forwarded to you shortly, Please proceed with the Grant issuance as soon as possible.

Thank you,

Louis A. Feudi



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