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June 24, 2004

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

RE: Comments of May 17, 2004
APPLICATION: KTB-SMF-XMTR Broadcast Sports Inc.

Dear Mr. Graff:

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,

Gregory M. Snyder
Chief EMC Engineer, Wireless/Telco Services Manager

Brian J. Dettling
Documentation Specialist

WLL Project: 7961

1) The frequency range on Form 731 does not match the Test Report device summary. Please address.

R. The frequency range has been corrected. Please see exhibit "SMF-XMTR Form 731 rev1.pdf".

2) The measured Pout does not match Form 731. Only measured values should be reported.

R. Power output on Form 731 has been corrected to match the measured value.

3) Table 4 on page 8 of 30 is blank.

R. Table 4 appears on page 9 of 30 of the test report.

4) Kindly identify the signal used to create the Occupied Bandwidth in Section 4.4 and 4.5 of the Test Report.

R. A 1Vp-p NTSC signal was supplied via a Tektronix TSG95 PAL/NTSG Signal Generator.

5) Please identify the voltage and currents in the finals as required by 2.1033(c)(8).

R. Please refer to the revised SMURF Technical Description, exhibit “SMF-XMTR Operational Description Rev1.pdf”.

6) Please provide a Tune-Up procedure as required by 2.1033(c)(9).

R. A Tune-Up Procedure has been obtained. Please see exhibit “SMF-XMTR Tune up Procedure.pdf”.

7) This licensed radio device quotes incorrect language for the label. Please use 15.19(a)(1).

R. This label is only required for receivers of Part 73 devices.

8) Since this device is large enough, this two-part statement should go in the EUT itself, not exclusively in the Manual.

R. The device is significantly smaller than a palm of a hand which has been the guidance given for meeting the requirements of 15.19(a)(5). Also, the label under 15.19(a)(1) does not appear to be a two-part statement.

9) The label itself is incorrect in its format. Please be sure FCC identifier is in the proper format FCC ID: XXXxxx (complete with colon) is the only properly recognized identification.

R. The label has been revised to show the FCC ID as pointed out. However, §2.925(a)(1) does not appear to require a “colon” in the identifier.

10) The Operational Description claims a “Modulation Bandwidth” of 17MHz. Please have the Applicant justify this statement. Does this mean the frequency for maximum signal throughput is 17MHz?

R. This is simply the bandwidth they are claiming that the signal occupies in the RF spectrum. Not the 20dB bandwidth.

11) Per 2.1033(c)(10) please provide a description of all circuitry used for suppressing spurious radiation and limiting modulation.

R. These are discussed in the Technical Description. The audio and video sections on pages 5 and 6 cover deviation and limiting. The power amplifier section gives details about the 7 pole filter used to suppress spurious emissions.

12) Please provide installation instructions for the end user, paying specific attention to methods to reduce one’s exposure to potentially harmful RF energies.

R. The SMURF devices are only installed by Broadcast Sports personnel.

13) The Confidentiality Request letter asks for confidential treatment of exhibits that do not exist for this filing. Please review your Confidential Request letter.

R. The Tune-up Procedure is now in place and completes the list contained in the letter.