



April 9, 2001

Federal Communications Commission
Equipment Authorization Division
7435 Oakland Mills Road
Columbia, MD 21046

Dear Sir or Madam:

This letter is a follow-up to request that the attached filing (FCC ID L2VAX620) be submitted for modular approval. Prior discussion with the commission centered on the issue of shielding for a Part 15 modular application. Axonn has modified its design to include a shield to comply with FCC Public Notice DA 00-1407. The L2VAX620 has an attached shield that is similar in form and function to the shielding of OJM-TR-916-SC, which has received modular approval of the commission. Axonn L.L.C. appreciates the fact that the commission must maintain product integrity without giving one company a competitive advantage over another company. In defense of Axonn's modular application for the L2VAX620, the following is re-stated:

1. The device incorporates the following harmonic suppression techniques:
 - Surface mount and co-planar technology is used throughout the design, minimizing stray RF fields that launch electromagnetic waves.
 - Novel filter technology that provides guaranteed suppression of transmitter spurious products by design. Each circuit is statistically modeled using computer aided design techniques for 6-sigma repeatability with the tolerances of the low-cost components used.
 - Innovative signal generation techniques which utilize the power of Fourier analysis to suppress even-order harmonics in the generation of the transmitted signal.
 - A self-contained, printed-circuit antenna is utilized to guarantee a stable output match to the final amplifier. The printed antenna dispenses with the variability of externally mounted alternatives that could provide indeterminate terminations to the transmitter output. Indeterminate terminations cause reflections to the output circuitry of other transmitters, resulting in increased spurious products.
2. All data inputs are buffered.
3. The device has its own power supply regulation.
4. The device is a complete transmitter module, with its own reference oscillator and printed antenna. All connectors are for power supply data inputs.
5. The device was submitted as a stand-alone unit for testing. The conducted emissions requirements do not apply as this will be a battery-powered unit.

Other points of discussion concerning modular transmitter approvals are covered in other portions of this application. Axonn L.L.C appreciates the approach that the commission has taken in regards to Part 15 modular approval, in that the modular approval guidelines allow rapid deployment of wireless technology while maintaining product integrity.

Best Regards,

David Alley
Axonn L.L.C.

