

11/12/07

AmericanTCB 6731 Whittier Ave. McLean, VA 22101

Attn: Tim Johnson

FCC ID: LUBP500CF-1 / IC: 2529A-P500CF1

Regarding your comment letter dated 10/18/07:

- 1. Corrected FCC ID on revised Cover Letter and Confidentiality Request. Uploaded.
- 2. MPE Exhibit. Will upload tomorrow.
- 3. Corrected number of channels referenced in revised Test Report. Uploaded.
- 4. The HP 437B also functions as a Peak Power Meter. See attached operating instructions from the users manual. Retested Peak Power using newly calibrated 30 dB attenuator. Peak Power measurement agrees with SAR Peak Power measurement. The 437B showed a difference of approx. 3 dB between Average and Peak, as is also shown in the SAR report. This indicates a 50% duty cycle (square wave) data train.
- 5. The EMC testing software used, CKC Labs EMITest, allows setup of bandwidths, units, sweep time, etc. The measurement was set for 500 second sweep time. The software divides the total span into 5 segments and sweeps each at 100 seconds per segment, the highest sweep time allowed by the instrument.
- 6. New bandedge exhibit showing compliance uploaded.
- 7. The spurious emissions measurements have been retested in Peak and Average modes. New data in updated report.
- 8. AC Line Conducted bandwidths are the standard 100 kHz RBW/VBW and 9 kHz QPA that we have always used.
- 9. AC Line Conducted plot shows that Peak measurements meet the Average Limits. No additional testing should be necessary.
- 10. SAR: I misspoke before. The SAR report shows both Average and Peak Power measurements.