

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

March 8, 2005

RE: Hetronic International

FCC ID: LW9-CS458TXN

I have additional comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Kindly note the Tune Up instructions use 9600bps (~4800Hz square wave?) and a deviation of 2.7KHz. This will affect several of your responses to my previous questions. First, Occupied Bandwidth should be provided using typical operating conditions and typical deviations. In this instance, Occupied BW should be provided using the modulating signal described in the Tune Up procedure. Second, whenever an analog transmission of data (typically F1D) occurs, the "classical" [2M + 2DK] method of determining Necessary Bandwidth is usually required. In general, using a "measured" methodology for determining necessary BW only applies to constant envelope RF emissions where changes in the data intelligence transmitted have no effect on the shape of the emission signature. Your explanation of using 3KHz at the highest deviation level is acceptable only if accompanied with an "Audio Response" plot showing the maximum deviation truly occurs a 3KHz. Please note that a deviation meter is highly suggested "eyeballed" spectrum analysis is not appropriate. This means a change to the requested emission designator may be required. Please supply new Occupied BW plots, a complete rationale for the requested emission designator [not just necessary bandwidth], and corrected application forms (if appropriate).
- 2.) Kindly confirm if Tune Up procedure does not need Confidentiality. If it does, then the Confidentiality Request letter will need to be updated.

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.