

06 April 2009

American TCB
6731 Whittier Avenue
McLean VA 22101

RE: Digi International
Response to 21- March 2009 Comments

FCC ID: FCC ID: MCQ-50M880 & IC: 1846A-50M880

In response to your comments on the above submittal:

1. ATCB Comments: The model number for this device that appears on the IC REL database is 50000880-xx. This model was approved in 2005 when wild card characters were allowed in an IC model number. ATCB has interpretations from 2007 that state wild card characters are not allowed in an IC model number (Please see all the other attachments sent with this request). ATCB will have to contact IC to determine if we can process this application as a reassessment, a family to a previously certified device or whether a new IC number must be obtained. This process may take several days or weeks since we have no control on when IC will respond.

RESPONSE: I believe this was successfully resolved and we are going ahead with the application with the revised and uploaded exhibits that will enable thru uploading of this reassessment to the IC website.

2. ATCB Comments: Please provide a cover letter for the FCC that describes the changes being made to this device and how these changes meet with the allowable changes under Section 2.1043 of the FCC Rules.

RESPONSE: See Digi Wi-ME Perm Chg Response to ATCB Comments.pdf.

3. ATCB Comments: Please provide a cover letter for IC that describes the changes being made to this device and how the modified product still qualifies for Certification in accordance with Section 5.4(g) of RSP-100 Issue 9.

RESPONSE: See Digi Wi-ME Perm Chg Response to ATCB Comments.pdf

4. ATCB Comments: Please provide a description of the type of antennas being added to this modular transmitter. For example, an Omni antenna is not a type of antenna. The FCC requires testing of the highest gain antenna of each type used with a transmitter. I note that only the 10 dBi gain antenna was tested with this transmitter.

RESPONSE: See Digi Wi-ME Perm Chg Response to ATCB Comments.pdf

5. ATCB Comments: Please describe the type of antenna connector used on each new antenna. For example, the photos seem to indicate that an N type connector is used on the 3 dBi antenna.

RESPONSE: See Digi Wi-ME Perm Chg Response to ATCB Comments.pdf

6. ATCB Comments: Please provide a product label that includes the IC number, model number and applicant's name in accordance with Section 5.4(f) of RSP-100 Issue 9 for a reassessment application.

RESPONSE: See label exhibit that has been uploaded to the application.

7. ATCB Comments: Please provide a completed and signed copy of Annex B of RSS-102 in accordance with Section 5.4(e) of RSP-100 Issue 9.

RESPONSE: Uploaded to application.

8. ATCB Comments: For transmitters with detachable antennas, IC requires statements from Sections 7.1.4 and 7.1.5 of RSS-Gen to be incorporated into the user manual. No user manual was provided. Please provide a user manual that contains the following statements and information:

(a) This device has been designed to operate with the antennas listed below, and having a maximum gain of [x] dB. Antennas not included in this list or having a gain greater than [x] dB are strictly prohibited for use with this device. The required antenna impedance is [y] ohms.

(b) A list of the antennas acceptable for use with this transmitter shall immediately follow the preceding statement.

(c) To reduce potential radio interference to other users, the antenna type and its gain should be so chosen that the equivalent isotropically radiated power (e.i.r.p.) is not more than that permitted for successful communication.

RESPONSE: See Digi Wi-ME Perm Chg Response to ATCB Comments.pdf and manual exhibit.

9. ATCB Comments: Please confirm that the output power was measured from this transmitter and report the measured values on the low, middle and high channels. The FCC requires a demonstration that the output power level is within a measurement tolerance on a Class II Permissive Change application

RESPONSE: This is Joel Schneider's response to both 9 and 10: Since a change in output power was not part of the product change, and a change in output power would not enable the product to be in line for a permissive change, we did not see the need to remake this measurement. The power level 15 is to denote the mfr. output level of the chip, it is not an enduser controlled setting.

10. ATCB Comments: Please describe what is meant by the statement in the test report on page 9 of 36 that the power level was set to power setting 15 for all the radiated emissions testing. What are the available power settings for this device?

RESPONSE: Please see above and let me know if you need anything further to address this item.

Please let us know if anything further is required.

Susan L Rupp

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