

Intertek Testing Services (ITS) NA, Inc.
70 Codman Hill Road
Boxborough, MA 01719

Attention: Roland W. Gubisch – Chief Engineer, EMC and Telecom

Re: Application for VHF Digital Transmitter (VDT) Certification – FCC ID: MIJCM350V

Mr. Gubisch:

This letter and attached Exhibits are in response to the final review questions/comments you conveyed in your e-mail for the CM350V FCC Certification filing. Our responses and/or associated reference documents are provided below following each of your questions or comment.

Final Review Requests/Comments (per e-mail dated 7/17/08)

1. The Telerad test report shows frequency stability measured down to -20°C. The requirement from 2.1055(a)(1) is a low temperature of -30°C. Either the transmitter must stop operating below -20°C, or stability data is needed down to -30°C.
Response: Per our previous email discussion, the reference oscillator data sheet is provided to illustrate compliance with the temperature frequency stability requirements. Also, additional operating voltage versus frequency stability data has been taken. All of this information is now included in a revised Exhibit 6B which is attached.
2. Exhibits are needed for tune up procedures and parts list.
 - a) a suitable tune up procedure can be found in the user manual, see attached. Is this acceptable for use?
Response: Yes, please use the tune up procedure found in the user's manual. I have included this information in Exhibit 10 sent as an attachment.
 - b) a parts list is needed, but only for the RF circuitry.
Response: This is also included in Exhibit 10.
3. Both the tune up procedure and parts list can be covered under permanent confidentiality; if so desired, a revised confidentiality request should be provided.
Response: A revised confidentiality request (Exhibit 13RevB) has been sent as an attachment.
4. Receiver compliance with Part 15 subpart B radiated and conducted emissions is subject to Verification, when the associated transmitter is certified. Supporting documentation for the receiver is not required to be filed with the FCC, and I would therefore recommend not uploading exhibit 06B.
Response: The previous Exhibit 6B has been replaced with a new Exhibit 6B (Revision A) containing the frequency stability data.
5. Draft Grant notes are attached. Please review and comment. The only functions being authorized are the two A3E emissions listed in your revised Form 731. The transmitter has ACARS capability according to the operational description, but this will not be covered in the Grant.
Response: Yes, this is understood.

Please contact me by telephone at (480) 441-3725 or via email at Gil.Estrella@gdc4s.com if there are any further questions or additional information needed regarding this filing.

Sincerely,

Gil O. Estrella /s/
Gil Estrella
EMC Engineer
GDC4S