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Date: September 7, 2011

To whom it may concern,

Declarations
FCC ID: ORV-TOPCATTTC
FCC ID: ORV-MC
IC: 1732B-TOPCATTTC
IC: 1732B-MC

I, the undersigned, hereby declare that

1. The device does not use the provisions of 47CFR 15.323 (c) (6), random waiting mechanism is not used in this system.
2. The provisions of 47CFR 15.323 (c) (10) and 47CFR 15.323 (c) (11) are not used to extend the range of spectrum occupied over space or time for the purpose of denying fair access to spectrum to other devices.
3. Media Connector(MC) will act as the initiating device(s), which will initiate the establishment of the duplex connection.
4. The device complies with the provisions of 47CFR 15.319(f). The device shall automatically discontinue transmission in case of either absence of information to transmit or operational failure. These provisions are not intended to preclude transmission of control and signaling information or use of repetitive codes used by certain digital technologies to complete frame or burst intervals. The following table explains the reaction of device in case of either absence of information to transmit or operational failure after a connection of its companion device is established.

	Circumstances	Reaction of TopCAT(TC)	Reaction of Media Connector (MC)
1	Switch-off device	A	C
2	Remove power from device	A	C
3	On Hook on device side	N/A	N/A
4	Switch-off companion device	B	A
5	Remove power from companion device	B	A
6	On Hook by companion device	N/A	N/A

- A – **Connection is terminated and, transmission ceases.**
- B – Connection is terminated but device transmits control or signaling information.
- C – Connection is terminated but companion device transmits control or signaling information.
- N – Not applicable

If you have questions or need further information, please contact the undersigned.

Regards,

Name: John Chabot

Title: Compliance Engineer