



June 14, 2006

Office of Engineering Technology;

The filing of a class II permissive change on product was a suggestion made by your office responding (dated 5/17/2006) to an inquiry that I made to your office. This letter is our response to OET's correspondence, reference number 31065, and to comply with CFR 47 part 2, section 2.1043 of the FCC rules.

1. The changes that Arrista wants to make to the product with FCC ID P35SSG-819-1W2W are as follows:

a) The present product label indicates the following text: "Caution: The use of an antenna with gain > 3dBi is prohibited and in violation of FCC Regulations". There is no such restriction or wording identified in the FCC rules, as such does not need to be inscribed on the product label. Secondly, we have been granted a US patent, which Arrista wants to be clearly marked on its product label. The addition of any text on the present label would necessitate that a larger label stock be used which increases the product cost, and Arrista wants to keep its costs down in a highly competitive market where margins are razor thin.

b) The product installation manual has been updated and clarified. Under Warnings! Section the following will be deleted:

"For optimum performance and compatibility with cellular service provider requirements, it is recommended that an external antenna with a maximum gain of 3dBi be installed". This statement is redundant, because Arrista's products are by design optimized and highly compatible with all cellular modulations be they AMPS, CDMA, GSM850 and/or TDMA operating in the 800MHz Cellular or 1900MHz PCS band. Arrista products use active levelling circuitry and gain hold circuits; by design Arrista's mobile amplifier products always try to reduce their gain.

"Use of cellular amplifiers with antennas of higher gains than 3dBi is in violation of FCC and Industry Canada regulations, the offender will be liable and warranty claims will be voided" The statement is a redundant to the one inscribed in on the product label and should be eliminated for the reasons outlined in a).



As well Arrista has edited the MPE Notice paragraph and provided a look-up table of antenna gain correlated to separation distance to adhere to the MPE exposure limits stated in FCC CFR 47 part 1, section 1.1310 and OET Bulletin 65. The calculated values are based on worst case installations and the lowest MPE limit value i.e. calculations were generated using zero loss interface cabling, and as well as, used the lowest operation frequency of the amplifier (800Mhz) to calculate the MPE spec limit.

In conclusion, besides the changes described above, no other change is being made to the product, i.e. none of the product's internal electronic circuitry nor its mechanical housing has been altered or modified.

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