



# Washington Laboratories, Ltd.

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September 5, 2002

Mr. Tim Johnson  
American Telecommunications Certification Body Inc.  
6731 Whittier Ave  
McLean, VA 22101

RE: Comments of September 2, 2002  
APPLICATION: P9X-EMS-MM-GE Eka Systems, Inc.

Dear Mr. Johnson:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in ***bold italic***. Many responses refer you to additional exhibit(s) which has been uploaded to the application folder at the ATCB website.

Thank you for your attention. Please feel free to contact us for any additional information that you may require.

Regards,

*Gregory M. Snyder*  
Chief EMC Engineer, Wireless/Telco Services Manager

*Brian J. Dettling*  
Documentation Specialist

WLL Project: 7044

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September 2, 2002  
RE: Eka Systems, Inc.  
FCC ID: P9X-EMS-MM-GE

1) Please provide photograph of the back of the Bluetooth TX module.

***R. Please see exhibit "Additional EUT Photograph.pdf" that was uploaded in response to Item 1 of your comments of August 1, 2002.***

2) The device is classified as a mobile device. Therefore the RF exposure information should specify a 20 cm distance in the users manual based on its classification. MPE calculations of course show that

the device easily meets at a closer distance. Please adjust the users manual so that the RF exposure information states 20 cm.

3) From your response a modular approval is not being pursued. Therefore the labeling on the outside of the meter will be for the entire device and not just the transmitter board. Please update the labeling on the outside of the device and the references made by the users manual (i.e. do not reference "Contains" in the labeling).

4) The users manual appears to be for part of a system. Since the device is installed in equipment used at subscribers facilities (see 15.103(b)), the users information specified in 15.105 be included in the manual.

***R. The Users Manual has been revised to address comments 2 through 4 above. Please see exhibit "Revised User Manual 9.05.02.pdf."***