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September 9, 2004

Mr. William Graff - American Telecommunications Certification Body Inc.

Mr. Mike Nicolay - FCC Equipment Authorization Branch

CORRESPONDENCE	13667, dated 8/31/04
APPLICATION:	PYFAR400US Matrics, Inc.
731 Confirmation Number:	TC817139

Gentlemen:

Below are the comments that have been 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: 8096

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1. Please explain if the transmitter is transmitting CW signals, I could find no spectrum plots and the operational description doesn't seem to indicate what type of modulation is being used, if any. We have consistently denied proposals for RF tag readers that transmit a CW signal to a passive tag under the Frequency hopping rules in Section 15.247. For these systems, the transmit bandwidth (cw signal) does not match the receiver bandwidth as required by Section 15.247(a)1. Also the definition of a Frequency hopping system in Section 2.1 requires that the carrier of a frequency hopping system be modulated with coded information. A device using CW signals to read passive tags and applying under the FHSS rules in Section 15.247 would not meet these requirements.

R. The transmitter is not transmitting CW signals. The modulation used is AM (ASK) as shown in Section 3.1 of the AR400US Operational Description. Additionally, the modulation can be seen in the Occupied Bandwidth plots in the test report Figures 4-8, 4-9, and 4-10.