



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

November 17, 2006

RE: Systems and Technology

FCC ID: RLS-STAVL06037

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) I am still having difficulties with the radiated ERP/EIRP for this device. Your Test Report claims a conducted power of approximately 1.5W for Part 22 and 0.8W for Part 24. Antenna gain, as quoted from your RF Exposure (MPE) report, is 0dBi. This means that I would expect to see, assuming all else was equal, an radiated power approximately .95W ERP for Part 22 and .8W EIRP for Part 24. This does not make sense. Your Form 731 chows simply .19W ERP for Part 22 and .16W for Part 24. Kindly explain how the ERP/EIRP can be 6dB low relative to the expected results.
- 2.) You have chosen the wrong label language for this device. 15.19(a)(3) is typically for Part 15 Unlicensed radio frequency devices which have no rights or protections guaranteed for use of the radio frequency spectrum. This device is a Licensed device and therefore specific rights against interference must be conveyed to the end user. The proper label language should be that of 15.19(a)(1). Please review.
- 3.) Will this be the only antenna used with this device?

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President and Director of Engineering

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.