



# Washington Laboratories, Ltd.

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September 22, 2006

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

RE: Comments of September 15, 2006  
APPLICATION: RWT-ER88 Etymotic Research, 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: 9319

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1) The 731 form cites RWT-88 while exhibits appear to cite RWT-ER88. Which is correct?  
Please correct affected exhibits.

***R. The 731 form has been corrected. See “ER88 Application Form – 731 revised”.***

2) Please update the 731 to include the power.

***R. See revised form.***

3) The block diagram should show the frequencies of all oscillators in the TX portion of the device (CFR 2.1033(a)(5)). Please update.

***R. There is a single 12 MHz crystal on the board. The other frequencies are derived from it by 2 PLL's. Please see revised Operational Description; "RWT-ER88I - Operational Description revised".***

4) According to recent FCC interpretations, the confidentiality letter must be signed by either the contact given on the FCC site for the applicant, or someone listed in the technical or non-technical portions of the 731 form. H Stephen Berger does not appear to be listed on the FCC site as the appropriate contact (FCC site shows Mead Killion). Please help correct the cover letters as necessary.

***R. Please see "RWT-ER88 - Cover Letter - RFC revised"***

5) Internal photographs appear to only be provided for one of the 2 parts of the device. Is there any circuits in the other part of the device that should be photographed? Please provide or explain.

***R. The second photograph of Page 1 of the internal photos exhibit shows the ear piece of the device that contains the battery. No circuits are contained in that housing.***

6) Schematics are not high enough resolution to read. Please update.

***R. Please see "RWT-ER88 Schematic new".***

7) Information in the application (731, report, etc.) mentions a frequency range of 2401 – 2480MHz. Please review as BT is normally 2402 – 2480 MHz.

***R. The frequency range is 2402 – 2480MHz. The typo has been corrected in the affected documents.***

8) RF exposure info in the manual should include no co-location information.

***R. Please see "RWT-ER88 - User Manual revised".***

9) The device appears to contain a USB connection for charging. However it is uncertain if this device is intended to directly connect to a PC for communication – although it appears unlikely. If so, the device should also be Certified or DoC'd as a PC peripheral. Please explain.

***R. The USB connector is only used for charging the unit. There are no other communications.***

10) The test report appears to contain a few "Error! Reference source not found" errors. Please correct.

***R. The test report has been corrected.***

11) Calculations appear unusual and off for duty cycle. Generally if 79 channels are used, the period appears unusually. Was the device in proper end use configuration or test modes? See BT theory of operation for more information.

***R. The device was set in this test mode to obtain a continuous transmission on a single channel. The Bluetooth chip (BroadCom BCM2037) is a Bluetooth 2.0 chip that meets the Bluetooth Core Specification V 1.0B (+ critical errata) and therefore complies with the Dwell Time requirements.***

12) The device is considered portable. All 3 axis positioning of the EUT should have been investigated in effort to obtain worst case data. Please explain.

***R. The device was initially scanned for radiated emissions in three orientations. The worst case orientation was tested and reported. This information has been added to Section 2.3 of the revised test report.***