



# Washington Laboratories, Ltd.

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December 19, 2007

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

RE: Comments of December 5, 2007  
APPLICATION: RWT-ER89 & IC: 6648A-ER89 for Etymotic Research, Inc.

Dear Mr. Fabina:

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,

*Steven D. Koster*  
EMC Operations Manager

*Brian J. Dettling*  
Documentation Specialist

WLL Project: 10120

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1) There are multiple problems with the letter requesting confidentiality of exhibits submitted to the FCC.

(a) Short term confidentiality is usually requested in a separate letter for 45 days at a time with a maximum of 180 days total, with extensions. Please see the attached for a detailed description of the process.

(b) Specific exhibits are requested to be held short term confidential for a 45 day period rather than the whole application. Again please refer to the attached for an explanation.

(c) Permanent confidentiality of the schematic diagram and layout of the circuitry cannot be granted because there is no exhibit of the layout of the circuitry.

After reading the attached, please revise the letter requesting standard (permanent) confidentiality and submit a separate letter requesting short term confidentiality that specifies the exhibits and the length of the request.

***R. The above items have been addressed in the following documents: “RWT-ER89 - Request for Short-Term Confidentiality – 071207” & “RWT-ER89 - Request for Standard Confidentiality – 071207”.***

2) Please provide a letter from Etymotic Research, Inc that gives TEM Consulting the authority to sign the letter of agency for Etymotic Research. The submitted agency letter is signed by a TEM Consulting employee who has no authority to act on behalf of Etymotic Research.

***R. Please see “RWT-ER89 - Authorization from Entymotic”***

3) Please provide a letter requesting confidentiality of exhibits for Industry Canada (IC). All exhibits are submitted to IC because of changes to their system in September of 2007. Therefore to protect release of confidential information from IC, submission of a letter to IC requesting confidentiality is recommended. Please see the IC application form on the ATCB website for an example letter.

***R. Please see “IC - Request for Confidentiality - 6648A-ER89 - 071207”***

4) Please submit a test setup photos exhibit. No test setup photos were provided for this device as specified by the FCC.

***R. Please see “RWT-ER89 Test Setup Photo”***

5) Please provide new internal photos of the subject device. The submitted photos are too dark to clearly show the component location on the printed circuit board.

***R. Please see “RWT-ER89 - Internal Photos 12.07”***

6) Please address RF safety in accordance with Section 15.247(i) of the FCC Rules. No RF safety evaluation was provided for the FCC.

***R. Please see “RWT-ER89 RF Exposure Info”***

7) Please confirm that this transmitter was tested with and without the boom microphone to evaluate worst case emissions from it. Also declare which configuration represents worst case for this accessory.

***R. The data presented in the report is the worst case data. The unit was evaluated with and without the boom microphone and the ear loop.***

8) Please describe what material the ear loop is made of. If any metal is incorporated into the ear loop, it should also be included in worst case emissions evaluation and disclosure of worst case configuration.

***R. The ear loop is all metal. The loop was installed with the boom and the emissions were investigated. The worst case emissions are the emissions that are in the report.***

9) In the test report, the fifth column in the radiated emission test results above 1 GHz on pages 50 of 59 to 57 of 59 indicate that the detector function was set to Quasi-peak but the notes column at the end indicates peak and average detectors were used. Please submit a corrected test report to indicate which one is correct.

***R. Report has been corrected to reflect QP was not used.***

10) The submitted IC application form is not completed at the end. The gain of antenna, type of modulation, emission designator and transmitter spurious headings on the submitted form are blank. Please submit a completed form.

***R. Please see “6648A-ER89 Application Form revised”***