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September 23, 2004

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

RE: Comments of September 17, 2004
APPLICATION: SA8MARKII-CII-DMD Communications International, Inc.

Dear Mr. Ward:

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: 8188

1) Please note that the internal photos do not appear to show all of the boards or components.

R. The exhibit has been upgraded to show all boards. Please see “Mark II Internal Photos Revised.pdf”.

2) Please provide internal photos showing tops and bottoms of all boards in the amplifier. Please note that the FCC ID label states, “THIS UNIT CONTAINS *Communications International, Inc.* Mark II Upgrade Kit FCC ID: SA8MARKII-CII-DMD”. Please note that the FCC identifier is to be on the device certified. This statement would indicate that the FCC ID’s device is inside the product. Please explain and please show where on the FCC ID’s device the FCC ID label is to be placed and please provide a sample of the actual label that is to be on the FCC ID’s device. If the product shown in the FCC ID label exhibit is the actual device, please clarify the term “contains”.

R. The phrase “This Unit Contains” has been removed from the label. Please see exhibits “Mark II Label and Location Rev 1.pdf” and “Mark II User Manual Rev 1.pdf”.

3) Please provide a 731 which clearly identifies the emissions designators to which this device operates. (i.e. your report states ‘digital modulation’ and ‘analog’ modulation, but does not clearly identify what emissions designator is used.) Please clarify. Please clearly identify these emissions designators in the report as well (i.e. F1D, F3E, GXW, G7W etc).

R. As the Mark II upgrade kit is used with the MASTR III Base Station (M/A-COM FCC ID: OWDTR-329-A2), the emission designations will be the same as for the MASTR III System (i.e. F3E, F1D, F1E, F2D and F2B). Please see exhibit “Mark II Application Form - 731 Revised.pdf”. Additionally, the test report has been revised to list these designators in Table 1. Please see exhibit “Mark II Test Report Rev 1.pdf”.

4) Please note that the plots provided in the report are not clear. It is not possible to clearly identify what the plot is saying. Please provide plots that are clear.

R. The graphics have been reworked in the revised test report and the PDF conversion settings have been upgraded to allow improved clarity of the plots.

5) Please provide intermodulation test data for this amplifier. Alternately please explain why intermodulation tests are not required. In the case of the later, please give justification for this position.

R. Intermodulation tests are not required as this amplifier is controlled by the MASTR III Base Station and is only connected to the single transmit output of the Base Station. Additional documentation (Maintenance Manual for the 110 Watt Power Amplifier with the MASTR III) has been provided for reference and to better explain the interface with the MASTR III Base Station. Please see exhibit “LBI-39127 Maintenance Manual.pdf”.

6) Please provide an MPE report or explain why an MPE report is not needed. Please provide justification if the latter.

R. This amplifier is intended for use at fixed base station sites only. The antenna used for the base station transmitter will be fixed-mounted on outdoor permanent structures. As stated in the MASTR III Grant the RF exposure compliance is addressed at the time of licensing, as required by the responsible FCC Bureau(s), including antenna co- location requirements of §1.1307(b)(3).