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September 15, 2005

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

RE: Comments of September 1, 2005
APPLICATION: SJ7TKEY96 NBB Controls + Components

Dear Mr. Graff:

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: 8520

1) Page 8 of the Manual shows this device operates at either 10 or 25mW. This appears to make this device more appropriate to the Licensed bands of 90.217. It seems to be appropriate to ask for some sort of Attestation that this device will not be adjusted in such a fashion that operation in excess of the limits of 15.231 is not permitted.

R. This has been reviewed with the client and they are aware of the power limitations needed to comply with the Part 15.231. They have added a statement to the manual immediately following the 10mW power rating. See revised manual.

2) FYI: It may be that the reference to "25mW FM" is a typo and should be "25KHz FM". Please review with Applicant.

R. The 25mW is a typo and has been corrected. See revised manual.

3) There is also a reference to a “data repetition rate” of 60ms. Does this indicate that polling or automatic transmission can occur? Kindly explain.

R. The unit has no polling or automatic transmission. A button must be depressed for a transmission to occur.

4) Please consider the Test Setup Photos. It appears that this device was tested with a large metal object – in this case a propane tank and heater – within the measurement ellipse described in ANSI C63.4. Please review and reconsider your radiated test data.

R. The heater is placed at the back edge of the tent which is well outside the required ellipse. The heater is located at about 3.2m from the periphery of the EUT and about 1.7m from the edge of the ellipse. Also, the height of the heater is about 50cm.

5) Please see your plots on pages 7, 8, and 9. No vertical graticule is present.

R. Plots with vertical lines have been included in the revised test report.

6) Please consider the “Class A” disclaimer on page 4 of the Manual. All 15.231 devices must meet the unintentional limits of 15.207 and 15.209. This invalidates the “Class A” distinction except in certain cases. Kindly provide a further justification or rationale for the inclusion of this language in the Manual.

R. The revised manual has been corrected to show the correct Part 15 statement.