



Mr. William Graff  
American TCB  
6731b Whittier Avenue  
McLean, VA 22101

RE: Internet Energy Systems  
FCC ID: SJM-C31W

Bill,

Below is our response to your request for more info.

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

1.) Please supply External Photos for this device.

External Photos have been provided.

2.) The Internal Photos are too small and too grainy to be useful. Please supply revised photos.

Internal photos have been re-taken and provided

3.) The Label is incorrect. All Licensed radio apparatus which contains receivers used in the Licensed bands should use the one-part statement contained in 15.19(a)(1).

The label has been corrected to state the following:

This device complies with part 15 of the FCC Rules. Operation is subject to the condition that this device does not cause harmful interference.

4.) The Confidentiality Request letter asks for both Operational Description and Theory of Operation to be held Confidential, but only one applicable Exhibit was uploaded. Please correct Confidentiality Request letter.

The Confidentiality Request letter has been revised and uploaded.

5.) The requested Emission Designator on Form 731 does not make sense. Please supply corrected Form 731.

Please contact me regarding this correction.

- 6.) The requested Equipment Code only applies to Part 15 devices. Please correct Form 731.

Please contact me regarding this correction.

- 7.) The Manual has the same Exhibit as the Operational Description – this is not allowed. Kindly supply appropriate Manual.

The manual has been drafted and uploaded.

- 8.) The Test Report is over 4MB and will not upload properly to FCC website. This is not allowed. Please remember to keep all Exhibits below 4MB. Our experience has shown that 3MB is the largest practical size allowed.

The report has been divided to allow a maximum 3MB size for each section and uploaded.

- 9.) The Occupied Bandwidth is taken on a 5MHz span. This is way too large to be useful. Kindly use a span of just a few hundred kilohertz as appropriate. Be sure to use the 1% rule for selecting RBW.

Occupied Bandwidth data has been corrected and revised in the uploaded report.

- 10.) There are several references to 15.247 in the Test Report which are not appropriate for this filing.

This has been corrected in the uploaded report.

- 11.) All of the Figure 7 plots are unreadable – please provide better plots.

The plots have been provided darkened for greater clarity.

- 12.) It appears from the spectrum plots presented that sub-harmonics – possibly from a frequency multiplier – may be present. Please provide measurements of these spurious emissions.

Measurements of these sub-harmonics have been provided under the .pdf file uploaded as “subharmonics”.

- 13.) Please provide a description of the digital modulation as required by Part 2.

A description of the modulation has been uploaded. The signal is FM Modulated.

14.) Please provide justification for any requested Emission Designator.

Please contact me regarding this request.

15.) Please provide Frequency Stability measurement results. FYI: All Licensed radio equipment must provide test data as requested by Part 2 of the Rules. Devices which utilize 90.217 may have an exemption from the technical standards, but it is still necessary to provide any information requested by 2.1046 through 2.1057. Please review

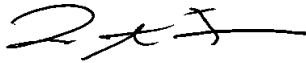
These results have been added to the uploaded report.

16.) Please provide E and I through the finals per 2.1033(c)(8). FYI: I suggest that each item in 2.1033(c) be reviewed carefully for completeness.

Voltage and Current in the Finals has been provided, uploaded under Finals.

Please contact me regarding items 5, 6, and 14, as well as with any further information you require.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Feudi', with a long horizontal stroke extending to the right.

Louis A. Feudi  
Operations Manager