

Date: 16 December 2008

RE: ArKion Systems. SM6-UGM-H. DSS Module. ATCB007113.

After a review of the submitted information, I have the following comments which require your attention:

1) The Operation Description document lists (in section 4.2) two antennas on the CCOM device, one for GSM/GPRS operation. Can you confirm that the CCOM is a separate device and not part of this application?

Washington Labs, response:

The Operational Description is for the UGMs and the CCOM. The devices are different units and the CCOM is not a part of this application.

Thank you,

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Except as described in §0.459, correspondence and responses should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued, unless a request for confidentiality per Section 0.457 has been made for that particular exhibit.

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