



Washington Laboratories, Ltd.

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December 10, 2008

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

RE: Comments of December 9, 2008
APPLICATION: SM6-UGM-L, ArKion Systems.

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,

Steven D. Koster
EMC Operations Manager

WLL Project: 10670

1) Please provide a corrected Form 731 with the proper FCC ID. Note that the 'Equipment Product Code' should not include the Grantee code. Please also provide the actual FCC ID label for this product as a separate exhibit, not just a description. Note that we are required to have 100% consistency for FCC IDs across the entire filing.

R. The 731 form has been corrected and uploaded. A new FCC ID label exhibit has been uploaded. I have also uploaded a drawing of the label for the final product.

2) Please review your agent authorization letter, your confidentiality request, and modular request letters. There must be an unbroken chain of authority from the Grantee code contact to the signers of these letters.

R. The FCC Grantee code contact has been changed to reflect Thomas Cullinan as the contact.

3) DA00-1407 has been superseded. Please refer to the correct FCC Rule parts for Unlicensed modular approvals.

R. The reference to DA00-1407 has been changed to FCC Part 15.212 in the request for modular approval cover letter. See new cover letter.

4) Parts and tune up are not required for Part 15 submissions. Do you really want these documents provided to FCC? If the answer is no, then you must modify your confidentiality request letter – you can never ask for confidentiality on an Exhibit that is not in the FCC database. In addition, your block diagram appears in the manual – you cannot ask for confidentiality on an exhibit contained inside another exhibit which cannot be held confidential

R. Please remove the parts and tune-up exhibits from the application, the Request fro Confidentiality has been corrected and uploaded.

5) External photos are always required for any Licensed or Unlicensed transmitter application. FCC does not have an option for providing just Internal or External photos.

R. Photos were mislabeled, please see the external photos that have been uploaded.

6) It appears that your Internal Photos exhibit shows the device inside of the “electric meter” host – is this correct? If so, this is not appropriate. We will need photographs of just the module, exclusive of the host.

R. Photos were mislabeled, please see the internal photos that have been uploaded. The module is designed to go into electric meters, but that photo has been removed.

7) Your MPE report uses incorrect limits for 915MHz. Please review and correct.

R. The MPE was calculated for 902.5 MHz because this would result in the worst case limit. Per the table in Part 1.1310 for this frequency range the limit is $f(\text{MHz})/1500$ for uncontrolled exposure. This calculation results in the $.602\text{mW}/\text{cm}^2$ limit in the MPE report.

8) Your test report specifies that you tested this device with a notebook PC running HyperTerminal, but your Test Setup photos appear to show serial port connections using an electric meter only. Please comment and/or explain. Note that if a PC is used, the test setup must conform to the minimum requirements of ANSI C63.4 2003.

R. The PC was used to place the transmitter into the correct mode for testing and then removed from the set-up for the radiated emissions testing. That is why it does not show up on the test setup photos.