



Thursday, January 19, 2006

To: Mr. Tim Johnson
ATCB
RE: Nivis, LLC.
FCC ID: SQB-NIVISP9050103

After a review of the submitted information for FCC, I have a few comments on the above referenced Application.

- 1) The newly provide cover letter appears to incorrectly cite the limit. The limit should be $43 + 10 \log (P)$ or -13 dBm not simply 13 dB. Please re-verify data and compliance and if applicable please update letter to correct.

Data re-verified, compliant and letter corrected.

- 2) Test Photos do not appear to make sense (i.e. Note: Not as Shown etc.). Please call to discuss.

Test photos show the original test setup before the antenna were separated to 101 cm distance apart. This has been explained in the Test Photos section.

- 3) It appears you are citing a 101 cm distance between antennas. It is uncertain how this will be accomplished given the antennas are not part of the enclosure/device. How can this distance be insured? If necessary, please provide additional photographs. It may be the professional installation may need to be justified for this configuration, which would require uploading a exhibit cover the various aspects of professional installation.

The 101 cm separation will be insured when Nivis builds the end products.

- 4) Internal Photos 2 and 3 suggest different distances between antennas. Please explain.

Photos corrected.

- 5) All photos suggest a much closer antenna to antenna distance than 101 cm. Please review/explain/correct as necessary.

Corrected.

- 6) There appears to be a few incorrect assumptions in the RF exposure exhibit (limits based upon highest frequency, calculation of ERP vs. EIRP for power density, incorrect assumption to add 2 densities since different limits apply for both, and use of numbers during final addition different than actually worse case calculated). Please call to discuss and correct.

RF exposure re-calculated and uploaded.

- 7) FYI....Intermodulation test results have not been reviewed since in May 2005 the FCC no longer requires this to actually be submitted for review (but the requirement itself still stands). It is the responsibility of the laboratory/manufacturer to ensure this requirement is met.

Confirmed.



8) FYI....Proposed Grant Notes:

Modular Approval. Power Output listed is Conducted. This transmitter is authorized only for use in devices where the antenna may be installed such that no less than 20 cm will be maintained between the antenna and users, as specified in this filing. The antenna used for this device must be installed to provide a separation distance of at least 20cm from all persons, and must not be collocated or operating in conjunction with any other antenna or transmitter other than those shown in applications under this FCC ID. Integrators must be provided with antenna installation instructions and transmitter operating conditions for satisfying RF Exposure compliance.

Co-located transmitter configurations only for specific host configurations and specific antenna configurations have been evaluated as shown in applications under this FCC ID. Co-location with FCC ID: SQB-NIVISSGM48 requires a minimum separation distance of 23cm between antenna and users and co-location with FCC ID: SQB-NIVISCM42 requires a minimum separation distance of 23 cm between antenna and users.

Please contact me with any further comments,

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Feudi', is written over a horizontal line.

Louis A. Feudi
Operations Manager