



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

June 22, 2007

RE: ATCB005052 FCC ID: UVV-ZPOB & IC: 7070A-ZFOB for Zylaya Corporation

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

1. Provide the pseudo randomly ordered list of hopping frequencies used for the subject transmitter to demonstrate compliance with Section 15.247(a)(1) of the FCC Rules.

Response: This is shown in Figure 7 of the operational description (PDF page 7, footer shows page 10 of 12): 1, 4, 2, 5, 3, etc.

2. Provide measurement data that shows the subject transmitter meets the channel dwell requirements in Section 15.247(f) of the FCC Rules.

Response: It was not possible to measure the dwell time with the test sample. The manufacturer has attested to the fact that the device meets this requirement and provided a technical description in section 3 of the operational description (PDF page 7, footer shows page 10 of 12).

3. Provide an occupied bandwidth plot in accordance with Section 4.6.2 of RSS-Gen Issue 7 that shows the bandwidth of the emission 6 dB down from the maximum level of the modulated carrier. IC requires this submission even though the FCC does not. This information is needed to confirm the occupied bandwidth of the emission designator required for IC.

Response: Since an occupied bandwidth was not specified in the applicable section of RSS-210, the 99% bandwidth was used and reported per RSS-Gen Issue 7 Section 4.6.1.

4. Provide a signed copy of Annex B of RSS-102. The Declaration of RF Exposure Compliance must be signed even when the device meets the exemption from routine evaluation limits in Sections 2.5.1 or 2.5.2. See Section 2.4 of RSS-102.

Response: Please see Annex B uploaded with this response.



Richard Fabina Examining Engineer

[mailto: rfabina@AmericanTCB.com](mailto:rfabina@AmericanTCB.com) 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. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued. Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted. Any questions about the content of this correspondence should be directed to the sender.