Washington Laboratories, Ltd.

7560 LINDBERGH DRIVE
GAITHERSBURG, MD 20879
(301) 417 – 0220 FAX # (301) 417 - 9069

October 23, 2007

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

RE: Comments of October 1, 2007
APPLICATION: VE4-GW2C-AC for Axiometric, LLC

Dear Mr. Fabina:

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

Brian J. Dettling
Documentation Specialist WLL Project: 9684

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1) Either provide confirmation that this frequency hopping transmitter meets the Bluetooth industry standard or provide documentation that it meets the following:

(a) Pseudorandom hopping requirement in Section 15.247(a)(1) – describe how the hopping sequence is generated and provide an example of the hopping sequence channels,

(b) Equal frequency use in Section 15.247(a)(1) – describe how each transmitter meets the requirement that its hopping channels are used equally on average (e.g., that each new transmission event begins on the next channel in the hopping sequence after the final channel used in the previous transmission event),

(c) System receiver input bandwidth in Section15.247(a)(1) – describe how the associated receiver complies with the requirement that its input bandwidth (either IF or RF) matches the bandwidth of the transmitted signal,

(d) System receiver hopping capability in Section 15.247(a)(1) – describe how the associated receiver has the ability to shift frequencies in synchronization with the transmitted signals,

(e) Coordination capability in Section 15.247(h) – describe if this transmitter can recognize other users within the spectrum band so that it individually and independently chooses and adapts its hop sets to avoid hopping on occupied channels and how this is accomplished.

R. Please see "Gateway 2C Operational Description revised".

2) In accordance with Section 15.247(i), please provide an RF exposure analysis indicating that this transmitter complies with the appropriate RF exposure limits.

R. Please see "Gateway 2C RF Exposure Info".

3) Please provide an amended user manual that contains instructions and operating conditions that must be followed to operate this transmitter in a manner that it meets the FCC RF exposure limits. For example, the manual contains no information that instructs the installer to mount the device in such a manner that it is at least 20 cm from all persons during operation. There is also no statement for users to maintain this distance from the transmitter during operation.

R. Please see "Gateway 2C User Manual revised"

4) The output power measured from this transmitter (22.77 dBm) does not agree with the output power stated in the specifications in Section 6 of the user manual and the operational description (24 dBm). Please explain this discrepancy in output power for this device and correct any incorrect exhibits.

R. Please see "Gateway 2C Operational Description revised".

5) Please provide a signed copy of the agency letter and the confidentiality letter for this device. Neither of the two provided letters contained a signature on them.

R. Please see "Gateway 2C Cover Letter - LOA revised" and "Gateway 2C Cover Letter - RFC revised".

6) Please indicate what type of antenna connector is used for the antenna on this device. Section 15.203 of the FCC rules requires a unique connector or other conditions to prevent the unauthorized use of antennas not approved for use with this device.

R. Please see "Gateway 2C Operational Description revised".