

March 9, 2010

RE: FCC ID: X7CAP8120, IC: 3794G-AP8120

Attention:

Please find our responses to your comments on this application below:

1. Terms and conditions form S56501 was not submitted. Please submit.

Response: See uploaded Terms and Conditions Form.

2. User manual and operational description were from the Nortel Communication. Please explain how Nortel Communication is related to Avaya, Inc

Response: The Nortel group that was responsible for the AP8120 was acquired by Avaya just prior to the application. Some of the documentation is still in the process of being converted over from Nortel to Avaya.

3. User manual attached is draft version. Final version of user manual should be submitted when available to the TCB for upload to the FCC website. The FCC expects the formal version of the manual to be uploaded before the product is released.

Response: Noted. Avaya is aware of the need to upload a final version of the User's Manual.

4. Schematics and block diagram are from Accton Inc, not from the applicant. Please explain how BCM4342mp-802.11a/b/g/n mini-PCI radio card relates to AP8120.

Response: Accton is the contracted designer for the product. Nortel/Avaya contracted them to develop the product on their behalf. The BCM4342mp-802.11a/b/g/n mini-PCI radio card is a subassembly within the AP8120 that contains the RF portion of the product. The AP8120 has two of these subassemblies installed.

5. Hardware Specification document is submitted in place of a Block diagram. The various block diagrams spread through this document do not show the rf frequencies. Please provide a document with just the block diagram or explain how the submitted document meets the requirements.

Response: See new block diagram exhibit. This supersedes the previously uploaded file.

6. AC line conducted emissions data was not found in the test data for the DTS report although results are included in the summary tables. Please submit.

Response: See revised DTS test report.

7. Please review the band edge conducted graph for the 802.11g mode (p139 of 185 in the test report / page 11 of 57 in T78130 DTS conducted) – the solid red line does not appear to be at -20dBc.

Response: See revised DTS test report.

8. AC line conducted emissions data was not found in the test data for the NII report although results are included in the summary tables. Please submit.

Response: See revised NII test report.

9. The user's manual indicates that the device can operate outside of the frequency bands covered by your application (specifically for Europe). Please provide an attestation letter from Avaya that explicitly states that the systems sold into the US and Canada are limited to operation across channels 1 through 11 in the 2.4GHz band and channels 36 through 48 in the 5150-5250 MHz band with no access for the user to modify the operating range outside of these settings.

Response: Uploaded "AP8120_US_Canada_Attestation_Letter"

Regards,



Mark Hill
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Updated Exhibits:
R78416, DTS Test Report
R78418, UNII Test Report
Terms and Conditions
Block Diagram
AP8120_US_Canada_Attestation_Letter