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June 15, 2011

RE: Avaya FCC ID X7C-AP8120 / IC 6384A-1004077

Attention: Mark Briggs

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

1. Your response explained that the cable is limited to a maximum 10 feet in length. Is there a minimum length or is it just the 10' cable that is used? Please provide the information so that it can be uploaded as part of the application to Industry Canada and the FCC

Response: See revised test report. The 10' cable is an option.

2. You did not confirm that the spurious emissions tests were performed with the minimum length of cable connected. Please confirm.

Response: See the revised test report and the test configuration photographs. Testing was performed using the Laird antenna without any cables between the AP and the antenna.

3. The Laird antenna specification details the connector type as reverse SMA but the Tyco antenna specification is for the internally mounted antenna and describes the connectors as the uFl style. Is this the specification for the externally-mounted version of the Tyco antenna or will it also use reverse SMA?

Response: There is no separate document for the externally-mounted Tyco antenna. There are six 3' RF cables that are fixed mounted to the Tyco antenna. The AP side of the RF cables use reverse gender SMA. Inside the antenna enclosure, the RF cables are directly soldered to the PCB assembly of the antenna.

4. Please provide pictures/drawings of the external assembly for the Tyco antennas if different to the information submitted.

Response: See the uploaded Tyco antenna photographs.

5. In your updated application you have requested confidentiality but no letter describing which exhibits should be held confidential, and why they should be held confidential, was provided. Please confirm that confidentiality is required and provide the appropriate letter(s).

Response: Confidentiality is not requested. Application form has been revised.

Note – Due to the revised test results, a new user's manual with updated separation distance has been provided.

Regards,

Mark E. Hill

Uploaded documentation: Application form Tyco antenna photographs Test configuration photographs Regulatory Manual Test Reports RF Exposure Calculation