

FCC

September 16, 2011

RE: Avaya FCC ID X7CAP8120,
FCC 731 Confirmation Number: EA455903
Correspondence Reference Number: 40341

Attention: Jyun-Cheng Chen

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

1. TYCO antenna technical specification; the current exhibit contains 3 unspecified photos. Drawings or photos showing the installed TYCO antennas are also desirable.

Response: A copy of the Tyco Antenna spec has been uploaded. Note, this is the same specification that was part of the original certification.

Please clarify your request concerning drawings or photos. Are you requesting drawings/photo of the internal Tyco antenna configuration? Or are you requesting drawings/photos of the external Tyco antenna configuration?

For the internal Tyco configuration, this configuration has not changed from the original certification, and therefore, has not been provided.

2. A table listing effective MIMO gains in various configurations.

Response: Refer to the "Effective Gain Summary" file that has been uploaded.

3. A revised user's manual. The current version can use a major overhaul; it is missing FCC version of statements/sections in DFS, DOC, TPC, indoor usage, and professional installation. Existing ones are all specifically for EC compliance. Chapter 2 is also within the context of Industry Canada.

Response:

On the bottom of page 5 – the FCC Class B statement is present, as required by 15.105 (b).

On the bottom of page 6 – the Non-Modification statement is present, as required by 15.21

On page 6 – the RF exposure statement is present, as required by Part 2.1091(d)(3).

On page 7 – there is a statement that specifies that the product is for indoor use.

This product is not restricted for professional installation. Therefore, any references to professional installation would be in appropriate.

You are correct, the information present in “Chapter 2”, on page 15, is intended to meet the Industry Canada user’s manual statement requirements for detachable antennas. As far as I am aware of, there is no similar statement requirement for the FCC.

Please specify which statements are missing by rule part, KDB, or Public Notice so that the user’s manual can be updated appropriately.

Regards,



Mark E. Hill

Uploaded documentation:
Tyco Antenna Specification
Effective Antenna Gain Summary