

October 27, 2009

RE: ATCB008301 – Original Equipment & Single Certification Applications (model EV3-AFI)

FCC ID: XND-BRH-1 & IC: 8519A-BRH1 for Evigia Systems, Inc.

The following is in response to the comments made on the above referenced application.

1. The submitted test report shows compliance with the Class A digital device AC line conducted limits in Section 15.107(b) of the FCC Rules. Unfortunately a Part 15 intentional radiator must comply with the AC line conducted limits in Section 15.207(a) of the Rules. These limits are identical to the Class B digital device AC line conducted limits contained in Section 15.107(a) of the Rules. You must demonstrate that when the digital circuitry is turned off and only the transmitter is operating that it meets the appropriate AC line conducted limits. The easiest way to do this is remove the power from the computer portion of this device, turn on the transmitter and measure AC line conducted emissions from it. Please provide an amended test report showing compliance to the appropriate AC line conducted limits.

The device in question is powered from the Class A computing device USB port and does not function without power and commands from that device. However, as requested the device has been modified to operate separate from the computing device and a generic wall adapter (5 VDC) has been used to demonstrate Class B compliance for the transceiver module.

2. For approval under Section 15.240(b) of the FCC Rules, a transmitter must be silent for no less than 10 seconds unless there is a transmission error, in which case a new transmission may be started. Please provide a more detailed operational description showing this rule is met.

The test report has been updated to detail compliance with regard to the 10 second silent period required.

3. For approval under Section 15.231(a)(2) of the FCC Rules, a transmitter activated automatically shall cease transmission within 5 seconds after activation. Section 6.1.1 and the user manual only support operation of this transmitter under Section 15.240 of the Rules. Please provide a more detailed operational description on how this device complies with section 15.231(a)(2) when it responds to a tag (automatic activation).

The test report Section 6.1.1. has been updated, describing that the reader only responds with a single request-mode transmission when activated by a transponder tag. If the tag is removed from its vicinity or fails to send a new automatic activation, the communication link stops.

4. The submitted user manual is geared to Section 15.240 operation of this transmitter. Please provide either a separate manual for transmitter operation under Section 15.231 of the FCC Rules or a combined manual that handles transmitter operation under both Sections 15.240 and 15.231 of the FCC Rules.

The manual provided covers both sections of the rules. The first page is always provided to the user. The second page of this manual is included when the device is professionally installed under 15.240.