



CAO GROUP, INC.

design • development • manufacturing

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November 3, 2009

Re: FCCID: XSVGC923436

Correspondence Ref No: 38279

Form 731 Confirmation No: EA205737

To Federal Communications Commission, Office of Engineering & Technology

This letter is provided at the request of an email sent on November 2, 2009 regarding the above identified Form 731 application. The request was made to provide more information as to why a new FCC ID is being changed.

The application in question is being sought for a new brand name of device that is similar in construction, conditions of use, and transmission/receiving behavior as another device previously granted a license by this office. The reasons are further detailed thus:

1. The model name of the device is different than the previous model, which is being offered to the U.S. market concurrently, albeit in different market segments.
2. The original FCC ID was issued to a different business entity (Ivoclar Vivadent, Inc.) than that which is making the current request (CAO Group, Inc.). The previous model is manufactured on an OEM private-label basis for Ivoclar Vivadent, and as such they obtained the FCC ID for their device. CAO Group now intends to release a duplicate device under a different brand name and the manufacturer on record as CAO Group. Where the Grant of Equipment Authorization indicates the Grant is not transferrable, and identifies Ivoclar Vivadent as the issuee, we are under the impression that a new Grant must be issued to identify CAO Group as the issuee for the new brand name.
3. The FCC ID for the previous device reflects the brand name of the previous device (FCC ID: TFIODYSSEY24G, where the brand name is "Odyssey 2.4G"). This similarity would be recognized by the industry and create a link between the previous device and the current submission. Such a link is contractually prohibited by our OEM customer (Ivoclar Vivadent). This is why Ivoclar obtained the FCC ID for their device, even though CAO Group is the actual manufacturer.

Please feel free to contact me with any further questions or requests regarding this application.

Regards,

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