

September 30, 2004

RE: Adimos, Inc FCC ID: SIV-WVM1101

Please see our responses to your questions.

1.) The supplied Internal Photographs are far too small and far too grainy to be of any practical value. Kindly submit revised photographs.

The internal photographs of the rf transceiver module are clear. The photographs of the main circuit boards, onto which the rf transceiver is mounted, are the fuzzy pictures. These will be provided by the manufacturer and we will inform you once they have been uploaded.

2.) There are no External Photographs. The FCC requires separate Internal and External photograph exhibits - no exceptions. Please provide.

The EUT is a module and has no enclosure, so there are no external photographs. We will provide the photographs of the module with the shield in place as external and those without as internal.

3.) There is no information presented for Label Location. Please provide.

A revised label and label-location have been uploaded.

4.) Is this to be considered a "Modular Approval"? If so, the requirements of DA 00-1407 must be followed.

Yes, please refer to file uploaded "Modular Exhibit.pdf". Note that the device does not contain voltage regulation for all of the different voltages used by the rf transceiver, and so a limited modular approval is requested that limits use of the module to Adimos and authorized OEMS.

5.) I am also concerned with the functionality of this device. The Commission usually requires devices that contain differing functions to be submitted as separate devices despite sharing the same RF portion. It is my suggestion that the "Tx" and "Rx" versions be segregated. If not, please provide justification for Certification under one single FCC ID.

The transmitter for this device is identical in all its functions. The difference between the AV transmitter and AV receiver is the type of connections. That part of the device that differs is separate from the transmitter subject to UNII rules.



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6.) No compliance information is included in the Manual. Please supply all relevant and required information.

Please refer to revised manual

7.) If Modular Approval is sought, please provide instructions for OEM integrators.

Please refer to revised manual

8.) The Manual appears to indicate that "country codes" can be set via software. This is not permitted under FCC and Canadian rules.

Removed, Please refer to revised manual

9.) It is impossible to identify the different components used in the Test Setup photographs. Please provide better Test Setup Photographs.

We are providing the original jpg format photographs, which are much clearer.

10.) Does this device use "F" style antennas? If so, then radiated testing with the antennas lying directly on the table is not permitted. You will need to retest with a minimum 1" non-conductive spacer under the antennas.

The antennas are not "F" style. They connected using UDFL connectors to the radio module on the AV transmitter and AV receiver.

11.) Please provide details on the antennas including photos for this device.

Please refer to the new test setup photos. If you need additional close-up photos we can provide these. We are also sending information for the antenna.

12.) You are requesting 62mW across the entire 5150-5359MHz band on your Application forms. This is not permitted. The limit from 5150-5250 is 50mW. There are multiple references within this filing across many Exhibits that may require modification.

The device is 46 mW in the 5150 to 5250 band and 62 mW in the 5250 to 5350 band. We are providing a revised application form.

13.) Kindly refer to your Block Diagram. The "Toshiba" RF module does not contain any information. Please provide a block diagram for the module.

We are providing a block diagram for the RF module.

14.) The Block Diagram for WVM-TX shows provisions for an External Antenna. Under what conditions will an external antenna be utilized?

The external antenna refers to the fact that the antennas for this module are connected using a UDFL connector. The integrator of the module is instructed to ensure that the connector is not accessible to the end user.

15.) Please explain how compliance with 15.407(c) will be maintained.

Please refer to addendum to the Technical Description



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16.) Please show how compliance with 15.407(e) will be maintained. This information does not appear in the Manual.

Please refer to addendum to the Technical Description.

17.) Please provide an attestation to the requirements of 15.407(f).

Please refer to revised manual that requires a separation distance of 20cm to ensure compliance with FCC RF radiation exposure requirements.

18.) Antenna integration requirements as specified in your Test Report [page 8] appear to be missing.

Please refer to revised manual requiring the integrator of the module to ensure that the antenna connector is not accessible to the end user.

19.) There is conflicting information with regards to RF power measurement. Was a power meter or spectrum analyzer used? If a power meter, please provide details on the video bandwidth of this device. If a spectrum analyzer, please provide details on the integration algorithm.

A spectrum analyzer was used for all power measurements. See page 6 of 32 of Exhibit 2 for details.

The following documents supporting this response have been uploaded to the ATCB website:

- User Manual 10-01-04.doc •
- External Photographs.doc
- RF Module Block Diagram-10-01-04.doc
- Antenna info.pdf
- Label Location.JPG •
- Tech Description addendum 10-01-04.doc
- ATCB Form 731 Revised.doc
- Modular exhibit rev 2.doc

Please advise of the detailed photographs of the non-rf circuitry are required and they will be uploaded as soon as they have been provided by Adimos.

Regards,

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David W. Bare