

September 27, 2002
Re: FCC ID H25VXS250
Attention: Dennis Ward

I would like to submit the following information in response to your questions.

1. The parts list will be separated from the theory of operation and resubmitted to American TCB for review. The tune up procedure will also be resubmitted without changes.

2. For the purpose of these tests, the RF output power of the unit was set as close as possible to the maximum level allowed in the tune up procedure, within the measurement capability of the available equipment. At the time of EMC testing, the maximum measured RF output power was +24.8 dBm. At the time of SAR testing, the testing laboratory measured the maximum RF output power at +24.6 dBm. The variation between these values is within measurement error of available equipment.

If it is assumed that the RF power measurement made by the SAR testing laboratory is accurate and is in fact 0.4 dB below the maximum allowable power stated in the tune up procedure (+25.0 dBm), then the SAR level at the maximum allowable power would be 0.4 dB higher than was actually measured at the time of testing. If the RF power were increased by 0.4 dB, then, by linear extrapolation from the measured data, the resulting level would increase to 2.96 W/kg., still well below the limits for Occupational/Controlled Exposure of 8 W/kg.

3. The device may be used with antennas from various manufacturers. Safe operation is insured by the guidelines provided in Appendix A, which will be added to the Operators Guide. The RF Exposure Statement appearing on page 3 of the Operator's Guide will be revised to read as follows:

RF EXPOSURE STATEMENT

When used as directed, the maximum SAR of this device is 2.7 W/kg, which meets the limits set forth by the FCC. Refer to Appendix A in this manual for instruction in the proper use of antennas with this device.

In addition, the following instruction will be added to pages 4, 11, and 19 of the Operator's Guide:

Warning: Refer to Appendix A of this manual for information on the proper use of antennas.

Appendix A, which will be added to the Operator's Guide, is shown on the following page.

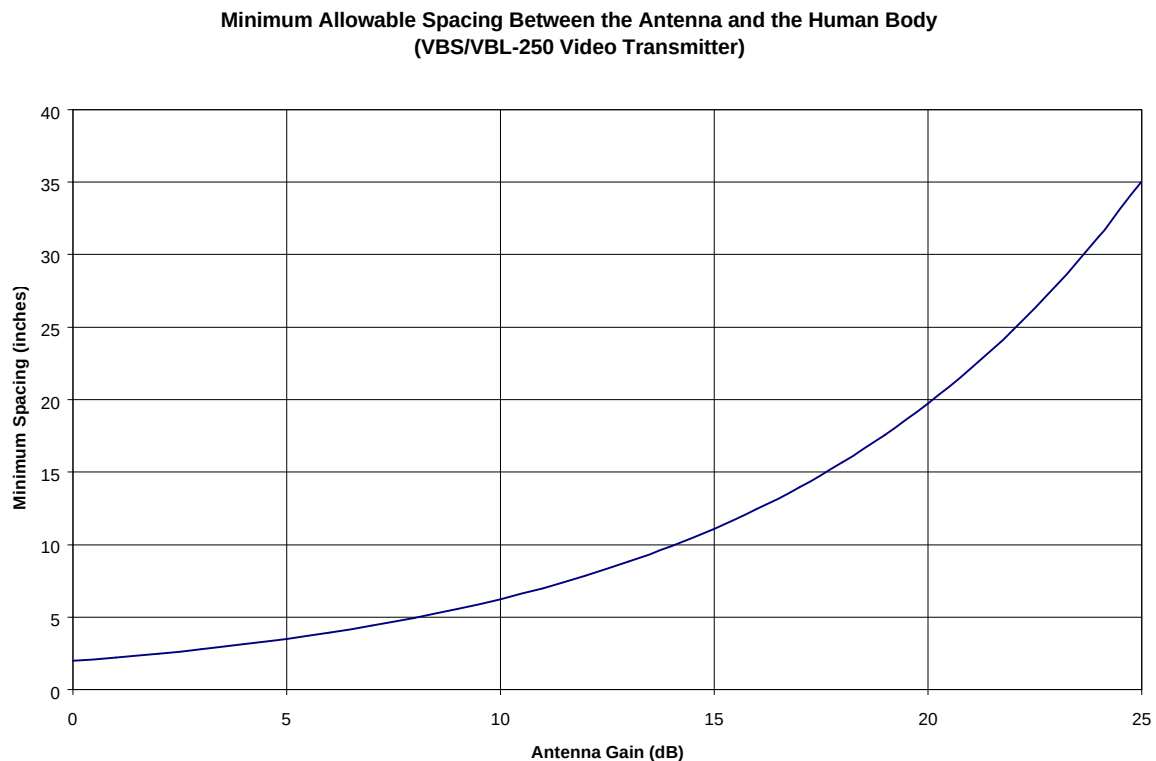
Appendix A: Using Antennas with the VBS/VBL-250 Video Transmitter

Bodyworn applications:

When the VBS/VBL-250 video transmitter is to be worn on the body, only the DTC VidiWire antenna system should be used. This antenna has been extensively tested and found to be safe when used as directed. The antennas used in the VidiWire system are clearly labeled as to which side of the antenna should be placed against the body. These directions must be observed to insure safe and effective operation.

Non-portable applications:

In fixed location applications any suitable antenna may be used. However, to insure safe operation, it is imperative that proper spacing be maintained between the radiating surface of the antenna and any persons body. The required spacing depends on the RF output power of the transmitter and the gain of the antenna being used. The chart below shows the correct minimum spacing for antennas used with the VBS/VBL-250 transmitters. If the gain of the antenna is unknown, contact the manufacturer of the antenna for this information. To insure that proper spacing is maintained, locate the transmitter or arrange physical barriers in such away that people are prevented from approaching too closely.



4. In portable applications, only the DTC VidiWire antenna system is to be used, as directed in Appendix A of the Operator's Guide. Antennas other than the DTC VidiWire system are only to be used in fixed location applications. As such, their use is regulated by Title 47 §1.1310. The information provided in Appendix A insures that the MPE limits set forth in Title 47 §1.1310 are not exceeded.

5. This device is not sold to or used by the general population, but to qualified organizations employing trained personnel who are fully aware of it's use and the inherent hazards therein. The information provided in Appendix A of the Operator's Guide instructs the operator in the correct deployment of the device so as to insure that the general population is never exposed to RF radiation that exceeds the limits set forth in Title 47 §1.1310.

Regards,

Joe Desjardins