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October 30, 2006

Mr. David Waitt
American Telecommunications Certification Body Inc.
6731 Whittier Ave
McLean, VA 22101

RE: Comments of October 23, 2006
APPLICATION: O7X-NERFFPS2-01 Pelican Accessories

Dear Mr. Waitt:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in ***bold italic***. Many responses refer you to additional exhibit(s) which has been uploaded to the application folder at the ATCB website.

Thank you for your attention. Please feel free to contact us for any additional information that you may require.

Regards,

Gregory M. Snyder
Chief EMC Engineer, Wireless/Telco Services Manager

Brian J. Dettling
Documentation Specialist

WLL Project: 9409

1) Recent FCC policy does not allow the FCC ID of a Part 15 device to be placed under the battery cover in the battery compartment of the device. Please relocate the FCC ID to the outside of the device keeping in mind that FCC also does not allow the FCC ID to be placed on the battery cover.

R. The label issue was discussed at the recent TCB training (October 2006). The policy you reference was aimed at cell phones where the batteries are pre-installed, usually in the store, and thus the consumer does not readily see and note the FCC ID. With the Pelican controller the batteries are always installed by the end user, thus the FCC ID is visible to the consumer. Additionally, the entire unit is contoured NERF material making it difficult to locate the ID in the body of the unit. The only other labeling on the unit has been on the battery cover. The manufacturer has committed to molding their FCC ID in the hard plastic battery compartment as has been accepted in the past.

2) Please a FCC non modification statement to the user manual per 15.21.

R. A warning statement is included in the User Manual. A snapshot of that section is provided here:



Warning

Do not take apart or modify your Nerf DuraGrip Wireless Controller or receiver unit in any way. Doing so will void your warranty and could void your authority to operate the device.

3) The test report (page 7 of 17) indicates that this unit uses pulsed transmissions. Please elaborate. Is the transmission really pulsed? If so, there does not appear to be any duty cycle correction applied to the peak emission levels.

R. In normal operational mode the transmit is pulsed, however, the test article was set to a continuous transmission for the testing.