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September 22, 2006

Mr. Tim Johnson
American Telecommunications Certification Body Inc.
6731 Whittier Ave
McLean, VA 22101

RE: Comments of September 15, 2006
APPLICATION: RWT-ER88I Etymotic Research, Inc.

Dear Mr. Johnson:

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: 9318

1) The 731 form cites RWT-88I while exhibits appear to cite RWT-ER88I. Which is correct?
Please correct affected exhibits.

R. The 731 form has been corrected. See “ER88I Application Form – 731 revised”.

2) Please update the 731 to include the power.

R. See revised form.

3) The block diagram should show the frequencies of all oscillators in the TX portion of the device (CFR 2.1033(a)(5)). Please update.

R. There is a single 12 MHz crystal on the board. The other frequencies are derived from it by 2 PLL's. Please see revised Operational Description; "RWT-ER88I - Operational Description revised".

4) According to recent FCC interpretations, the confidentiality letter must be signed by either the contact given on the FCC site for the applicant, or someone listed in the technical or non-technical portions of the 731 form. H Stephen Berger does not appear to be listed on the FCC site as the appropriate contact (FCC site shows Mead Killion). Please help correct the cover letters as necessary.

R. Please see "RWT-ER88I - Cover Letter - RFC revised"

5) BOM does not appear complete. Please review. Note that generally for a Part 15 device, this is typically not required. If removed from the application, please adjust the confidentiality letter as well.

R. Please remove the Parts List from the application package.

6) Schematics are not high enough resolution to read. Please update.

R. Please see "RWT-ER88I - Schematic new"

7) Information in the application (731, report, etc.) mentions a frequency range of 2401 – 2480MHz. Please review as BT is normally 2402 – 2480 MHz.

R. The frequency range is 2402 – 2480MHz. The typo has been corrected in the affected documents.

8) RF exposure info in the manual should include no co-location information.

R. Please see "RWT-ER88I - User Manual revised".

9) Is the preamp and spectrum analyzer listed in proper calibration. Please review. Also, note that the preamp is also listed in the associated application FCC ID: RWT-ER88.

R. The calibration due date of the preamp and spectrum analyzer have been corrected. The test report for the FCC ID: RWT-ER88 has also been corrected with the correct due dates.

10) Calculations appear unusual and off for duty cycle. Generally if 79 channels are used, the period appears unusually. Was the device in proper end use configuration or test modes? See BT theory of operation for more information.

R. The device was set in this test mode to obtain a continuous transmission on a single channel. The Bluetooth chip (BroadCom BCM2037) is a Bluetooth 2.0 chip that meets the Bluetooth Core Specification V 1.0B (+ critical errata) and therefore complies with the Dwell Time requirements.

11) The device is considered portable. All 3 axis positioning of the EUT should have been investigated in effort to obtain worse case data. Please explain.

R. The device was initially scanned for radiated emissions in three orientations. The worst case orientation was tested and reported. This information has been added to Section 2.3 of the revised test report.

12) This device does not show compliance to the requirement 15.247 (a)(1). Note that 2/3 of the bandwidth measured is 1.1 MHz.

R. The actual data listed in the bandwidth measurements table (Table 4) was incorrect. The table has been corrected and now corresponds to the data from the plots.

13) The test report appears to contain a few "Error! Reference source not found" errors. Please correct.

R. The errors have been corrected in the revised test report.

14) Test Report page 55 appears to have errors in the corrected uV/m column. Please review.

R. The table has been corrected to show the correct uV/m levels.