



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

November 13, 2004

RE: Internet Energy Systems

FCC ID: SJM-C31W

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Please supply External Photos for this device.
- 2.) The Internal Photos are too small and to grainy to be useful. Please supply revised photos.
- 3.) The Label is incorrect. All Licensed radio apparatus which contains receivers used in the Licensed bands should use the one-part statement contained in 15.19(a)(1).
- 4.) The Confidentiality Request letter asks for both Operational Description and Theory of Operation to be held Confidential, but only one applicable Exhibit was uploaded. Please correct Confidentiality Request letter.
- 5.) The requested Emission Designator on Form 731 does not make sense. Please supply corrected Form 731.
- 6.) The requested Equipment Code only applies to Part 15 devices. Please correct Form 731.
- 7.) The Manual has the same Exhibit as the Operational Description – this is not allowed. Kindly supply appropriate Manual.
- 8.) The Test Report is over 4MB and will not upload properly to FCC website. This is not allowed. Please remember to keep all Exhibits below 4MB. Our experience has shown that 3MB is the largest practical size allowed.
- 9.) The Occupied Bandwidth is taken on a 5MHz span. This is way too large to be useful. Kindly use a span of just a few hundred kilohertz as appropriate. Be sure to use the 1% rule for selecting RBW.
- 10.) There are several references to 15.247 in the Test Report which are not appropriate for this filing.
- 11.) All of the Figure 7 plots are unreadable – please provide better plots.
- 12.) It appears from the spectrum plots presented that sub-harmonics – possibly from a frequency multiplier – may be present. Please provide measurements of these spurious emissions.
- 13.) Please provide a description of the digital modulation as required by Part 2.
- 14.) Please provide justification for any requested Emission Designator.
- 15.) Please provide Frequency Stability measurement results. FYI: All Licensed radio equipment must provide test data as requested by Part 2 of the Rules. Devices which utilize 90.217 may have an exemption from the technical standards, but it is still necessary to provide any information requested by 2.1046 through 2.1057. Please review
- 16.) Please provide E and I through the finals per 2.1033(c)(8). FYI: I suggest that each item in 2.1033(c) be reviewed carefully for completeness.

William H. Graff
President and Director of Engineering

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.