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

August 11, 2006

RE: FCC ID: UFE-R3MOD24_ATCB003854
Attention: Kathy Grzovic

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1 Please note that module shielding is a requirement in accordance with DA001407 item 1. Please note that it does not matter if the device passes emissions requirements without shielding in place, the FCC has insisted that even in these cases, shielding is required. Please provide either evidence that the module complies with the shielding requirements of DA001407.

Response: The applicant is now seeking Limited Modular Approval; please refer to the revised letters uploaded with this response.

2 Please provide a manual that adequately gives instructions on how to label the host (i.e. the instructions to on placing "This device contains transmitter FCC ID:XXXX).

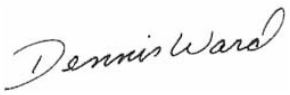
Response: This information was provided in the label exhibit. If the product is being approved as a LMA, is it necessary for the labeling information to appear in the user manual?

3 Please note that duty cycle corrections are allowed for FHSS devices, but no such factor appears to be suggested for DTS devices. As Zigbee devices are typically DSSS devices, please explain why the duty cycle was measured. Please verify if the duty cycle was not used in any average measurements for DTS transmission and please give just cause for using duty cycle calculations.

Response: Per FCC 97-114, "Guidance on Measurements for Direct Sequence Spread Spectrum Systems", under (2) of the section covering 15.247(c), "…If the emission is pulsed, modify the unit for continuous operation, use the settings shown above, then correct the reading by subtracting the peak-average correction factor, derived from the appropriate duty cycle calculation…" This technique was used to derive the average measurements from the peak measured from the continuous transmission.

4 Please note that the radiated emissions in the restricted bands appears to start at 4810 MHz and the restricted band at 2483.5 appears only to have been considered in the -20 dBc conducted measurements. Please verify that the restricted band at 2483.5MHz has been considered in the radiated emissions data.

Response: The restricted band at 2483.5 MHz is shown to comply with the radiated limits on page 14 of the test report where a delta was determined via a conducted measurement (per the "Marker-Delta Method" guidance). This delta was subtracted from a radiated field strength measurement. In fact, the peak measurement at the band edge is shown to comply with the average limit. The conducted spurious data shown on pages 15 and 16 of the report were taken in accordance with FCC 97-114, "Guidance on Measurements for Direct Sequence Spread Spectrum Systems", under (1) of the section covering 15.247(c).



Dennis Ward
mailto:dward@AmericanTCB.com

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.