Federal Communication Commission

July 27, 2010

RE: Comments on C2PC application for Avaya, Inc, FCC ID: X7CAP8120

Attention: Mr. Andrew Leimer

Mr. Leimer:

Please find our responses to your comments on this application below:

1) Verify that this device is to be used indoors ONLY. Dual use devices (indoor and outdoor) do not qualify for indoor use under KDB 443999.

Response: Please review the "AP 8120_FCC_IC_5.6-5.65GHz_Non_Operation_Statement.PDF" document that was uploaded with the filing for the C2PC. If this is insufficient, please provide specific comments.

2) Explain how this device meets the country code requirements of KDB 594280.

Response: Please see the uploaded attestation "Country Codes.pdf"

3) Submit the band edge plots tor 5600 and 5650 MHz.

Response: Please see the uploaded test report supplement "5600-5650MHz Bandedge plots.pdf"

Regards,

Mark Hill Staff Engineer

Elliott Labs for Avaya, Inc.

Uploaded Files:

Attestation - Country Codes.pdf

Test Report Supplement – "5600-5650MHz Bandedge plots.pdf"