



FCC ID: 2ABS2-SOSR1
IC ID: 11740A-SOSR1
CT Project: P13c0009

From: Chris Harvey
Date: 2/26/14

1. The RF Test report is not clear in terms of the Rule Section for which compliance is being sought (15.231a or 15.231e). It does appear that the intent is to show compliance with 15.231, but this should also be stated. The limit in dBuV has been listed in the report but the calculation to get the limit should also be shown. The requirements from 15.231 should be stated. The Fundamental Limit and the Field strength of Spurious Emissions should be shown as stated in the appropriate limit table from the FCC Rules, and any calculations should be shown. It appears that the spurious limit is from 15.209 and not 15.231. Also, frequencies in the Restricted Bands of 15.205 should be so noted and the appropriate limits and detectors should be used.

CT – The Test Report has been updated to show 15.231 limits and calculations.

2. Also, photographs of both a SOS Transmitter unit and an associated Receiver have been provided. It should be noted that a separate Transmitter and Receiver pair operating in 15.231 cannot be approved using a single FCC ID. A separate receiver device should be approved according to the appropriate requirements in accordance with the table in FCC 15.101. The photographs, Schematic, Block Diagram and BOM for the receiver will be removed from this application. It is likely that the same situation applies to Industry Canada and RSSS-310.

CT – Noted.

3. Devices being approved in accordance with FCC 15.231 are not subject to FCC RF Exposure evaluation and therefore the FCC 1.1310 RF Exposure Test Report exhibit will be removed from this application.

CT – Noted.

4. Please separate the Confidentiality Request exhibit into separate FCC and IC exhibits as the requirements are different and should not be combined.

SWG – Please refer to updated cover letters.

5. In the future, please provide test setup photos that show the EUT in the foreground and the test antenna in the background, as the details of the EUT setup are more important (especially for very small devices) than the image of the test antenna.

CT – Noted.

6. It appears that the FCC 15.231 test report is being submitted in the Industry Canada application. Please either update the FCC 15.2131 Test Report to specifically document compliance with the applicable RSS-210 requirements, or provide a detailed cross reference from each RSS-210 requirement and the data contained in the report showing compliance with that RSS-210 requirement.

CT – Please refer to Cross-reference exhibit.



7. The External photos show only one external side of a device . Additionally, the internal photos and label photo seems to only show a portion of the device that appears in the External Photos. Does this device separate into 2 halves? Are the Electronics only contained inside one 'half'? Please provide additional photos showing all sides of this device and clearly shows if this unit splits into 2 halves.

SWG – The pictures sent in the attached concentrate on the transmitter only. We are only certifying the transmitter. We sent both the transmitter and receiver to Compliance so the transmitter could be tested – but the receiver is not an intentional transmitter and therefore does not need certification.

8. For future applications, please note that a Tune-Up Procedure / Power Tolerance exhibit is only required for Part 15 devices that are subject to RF Exposure evaluations or for licensed devices.

CT – Noted.

9. Please note that the Company name on file with Industry Canada and FCC is Seibert Williams Glass, LLC, but some of the exhibits and forms are written for SWG Safety. Please update to be consistent.

CT – Noted.

10. Please update the RF Test Report to show plots of compliance with the timing requirements of either 15.321a or 15.231e as applicable.

CT – This information is found in the Theory of Operation.

11. Please update the Transmitter Block Diagram exhibit to include the frequencies of operation of the transmitter. It is noted that only 15.231e allows the transmission at predetermined intervals (such as 30 seconds as stated in the operational description), but both sections have timing requirements.

SWG – Please refer to updated Block Diagram.

12. The User's Manual exhibit should include the required compliance information required by FCC 15.19 and 15.21 as well as the RSS-GEN section 7.1.3 in English and French.

SWG – Please refer to User Manual_Bck_Rev1 exhibit.

Response by: SWG & CTL

Submitted by: CTL

Date: 3/20/14