



FCC ID: ALH442000

IC ID: 282D-442000

CT Project: 1460001

From: Shawn McMillen

Date: 06/26/2014

1) In the SAR report you have several items that are over the 7.0mW/g occupational. Please read part of the KDB 865664.

CT - Please see updated SAR report with additional plots.

2) Per 15.247(d) conducted spurious emission need to demonstrate that emissions are attenuated below the carrier by 20dB in a 100KHz RBW. The conducted spurious emission plots do not appear to show this. In addition it is unclear as to why the display line is set to -53dBm where this measurement is meant to be relative not absolute. Also if a filter was used, which probably doesn't need to be since the carrier is so low, this would need to be documented and the level of the carrier would need to be reported per 100kHz.

CT – The high pass filtered used is documented in the test equipment utilized section of the Test in question. The filter is also listed in the test equipment utilized list on pg. 29.

Using the band edge test plots on pg. 16 and pg. 17, which are taken at 100kHz RBW, it is easily determined the conducted spurious emissions are well below the -20dBc limit.

The -53dBm display line is for operator reference only and does not determine compliance in this test.

3) Require clarification. In the test report the 20dBc at the band edges reported on pages 16 and 17 were performed radiated whereas the spurious emission per 15.247(d) in 100KHz were performed conducted. Please explain the rationale for the different approaches.

CT – As stated within the Test Procedure (pg. 15 and pg. 10), the measurements were performed conducted for both mentioned measurements.

4) The section containing the dwell time does not sufficiently provide enough information that the EUT meets the rules. There is no calculation of the dwell time nor the amount of pulses within a period of time.

CT – The Test Report shows the timing of the hopping frequency. Using the customer's pseudo random timing details it is shown that the device complies to the .4 second specification.

5) The EMC report is missing the Canadian cross reference requirements.

CT – Cross Reference sheet has been supplied

6) The information that the Bluetooth meets the pseudo random requirements needs to be provided.

CT – Please see updated Circuit Description Exhibit.

7) The operational description of the Bluetooth indicates that it has extended data rates in addition to GFSK. Only GFSK was tested.

CT – Additional plots have been added to the test report to cover all data rates.

Response by: Compliance Testing LLC

Submitted by: CTL

Date: 7/2/14