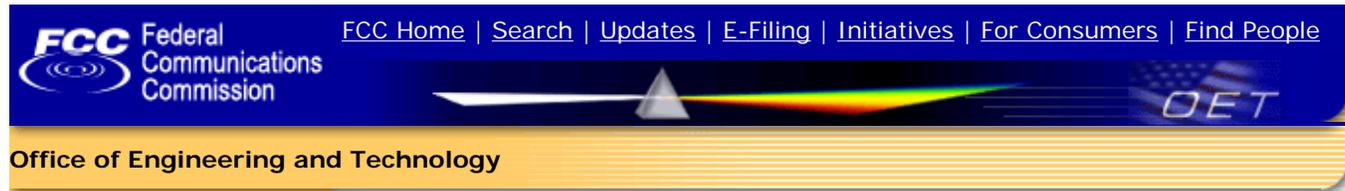


From: oetech@fcc.gov
To: hotline@AmericanTCB.com
Subject: Response to Inquiry to FCC (Tracking Number 521576) (TCB)



Inquiry:

---Reply from Customer on 12/21/2007---

The manufacture is anxious to proceed. We therefore have started a Permit-But-Ask inquiry within this KDB as referenced in the last reply. We have uploaded the 731 and associated exhibits to the 15.231 application.

While we understand that each combination of colocated TX requires separate RF exposure evaluation - the question posed here is will the main TX being certified here (345 MHz 15.231 TX) truly be considered as co-located when an optional GSM module is also integrated into the unit. Given the infrequency nature of transmission, and the 5 second limitation (which this is actually well beneath this as well) allow this to not be coined as "co-located" given the FCC's policy of allowing some overlap of other transmitters during handoff periods of up to 30 seconds. While this situation is not considered a handoff of transmission - the idea of the 15.231 TX having a 5 second TX limitation, and also that the power level and duty cycles under 15.231 are much lower than involved with other TX's following the policy regarding hand off of transmissions (i.e. WLAN to GSM), it would seem that we would not necessarily need to consider these co-located for purposes of RF exposure. Please let us know if the same policy above for handoff between networks can be applied here despite the fact this devices use is not handover transmissions.

Kindly note that the outcome of this KDB will affect the grant notes of the current application as well as would necessitate the need for a PC application to the optional GSM transmitter which is modularly approved. Please let us know.

FCC ID: CFS8DLLYNXREN-6
TC 276413

Note that a PC to the integrated module has not been filed as this is the subject of the KDB itself.

Thank you,

Tim Johnson

Response:

Q: Please let us know if the same policy above for handoff between networks can be applied here despite the fact this devices use is not handover transmissions.

A: same policy does not apply

FCC Lab staff review and update of multi-transmitter device policies and procedures is continuing.

Meanwhile, for this specific case of 15.231 and pt22/24 device (i.e. QIPMC56) installed in one enclosure for use in mobile or fixed RF exposure conditions, FCC Lab is not requesting a permissive change filing to amend certification contents and grant remarks for the associated device when used in this final product configuration.

TC276413 approved to grant contingent upon:

- a) device not otherwise excluded from TCB processing
- b) filing is in accordance with applicable FCC rules and policies
- c) please revise FCCID label placement exhibit to address: 1) 2.1033(b)(7) sufficient detail to permit name and FCCID to be read, and 2) revise to replace wording "TRANSMITTER MODULE (OPTIONAL)", i.e. use wording as in other label exhibit

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.