

Appendix A

Non-Conformities for US Radio Equipment Authorization

Non-Conformities FCC ID: EO9HHSR3 (CKC CS Ref # E09-000039-FCC-01)

The items listed below represent requests for information following review of this application for certification under United States (FCC) regulations. Further question may arise pending review of responses to these items.

OK	ID	#	Non-Conformity or Comment	Submitted Response	Respondent / Date of Response
X		1	There was not a drawing or Photo of the Label Provided. Please provide.	New Label and Label Placement Documents Sent.	Drew Rosenberg 5/8/09
X		2	There was not a drawing or Photo of the Label Location Provided. Please provide. Please note that the module itself is required to have its own ID label, however other label statements may be provided on the end-product label.	We do not expect to ever integrate into a non-battery powered device and decided to maintain the limited modular approval for that reason. HHSR3 integration spec.doc provided by Drew Rosenberg	Drew Rosenberg 5/1/09
X		3	There was not a User's Manual Provided. Please provide Note: manual provided must list necessary UM and label statements.	HHSR3 integration spec.doc provided by Drew Rosenberg	Drew Rosenberg 5/1/09
			Item not related to FCC application.		
X		5	The test setup photos provided do not include any antenna port conducted tests.. Please provide updated test setup photos.	See attached for NC #5 (test setup photos of conducted test).	Drew Rosenberg 4/29/09
X		6	The MPE calculations provided indicate the use of Occupational / Controlled exposure limits. If employing these limits, then the manufacturer must provide the training material and the appropriate RF exposure warning labels/statements with the application filing to ensure the user has the proper instructional materials in order to facilitate safe use of the equipment. The alternative is to provide the MPE calculations using the General / Uncontrolled population limits, (f/1500 instead of f/300). Please provide training material and / or updated MPE calculations as appropriate for this application filing.	We decided to go with General/Uncontrolled for RF safety. Documents: "RF Exposure - ISM TX-04-24-2009-DR" and "RF Exposure - MAS TX" provided	Drew Rosenberg 4/22/09 4/30/09
X		7	Please clarify whether the equipment was tested in three orthogonal	Yes, all three orthogonal planes were	Itron, 4/22/09

			planes during preliminary testing in order to determine the worst case emissions configuration with antenna position.	investigated during the testing. Worst case measurements were reported.	
x	8		<p>The modular approval letter as provided is for limited modular approval, however does not list the correct limitations. The RF exposure conditions are limited to mobile applications only by decree of the FCC except under certain controlled circumstances. However, the AC conducted portion of the testing was not performed and is therefore a condition of the limitation; see section in your letter addressing this concern, "The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacturer must provide adequate instructions along with the module to explain any such requirements."</p> <p>CKC CS recommends providing 15.207 compliance information as this appears to be the only barrier to full modular approval. Once an application has been granted, it cannot be changed to full modular approval; a new application for certification would be required.</p> <p>In either case, please revise the letter requesting modular approval as necessary.</p>	Updated Letter Provided	ITRON, 5/8/09
x	9		In the revised 15.249 test report there was a change of frequency range investigated made on page 6. However the test report does not list the test equipment used for 9kHz to 30MHz and is inconsistent with the information provided on page 3 and 5. Since the transmitter has frequencies below 30MHz, this testing may be required. Please update the test report accordingly.	Updated test report provided	ITRON 5/13/09

The items indicated above must be submitted before processing can continue on the referenced application. Failure to provide the requested information within 60 days may result in application dismissal pursuant to Section 2.917(c) and forfeiture of the filing fee pursuant to Section 1.1106.

How to read the table:

OK column indicates closure by CKC CS.

ID column is for use with Agents to assist in identifying the probable source for closure.

A - Application issue

TL - Test lab issue

C - Client issue

R - Retesting may be necessary

column indicates unique or separate non-conformity items (note some items may be related).

Non-Conformity or Comment column indicates the evaluators specific question or comment.

Submitted response column indicates the response or a summary of the response provided.

Respondent / Date of Response column indicates the responding party or agent and the date of the response was either received or logged.