

Non-Conformities FCC ID: GTC029894TXR (CKC CS Ref # E09-000157-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
√	C	1	FCC ID label has an FCC logo on it for Declaration of Conformity type applications and also "FCC ID". This device is going for Certification and not DoC. Please remove the FCC DoC label from the ID label. Also, the FCC ID number is incorrect since it is missing the Grantee part of the FCC ID number. Currently on the Product Code portion is included on the FCC ID number. OK-C Kendall , 21Jan10	Updated Label Provided.	Ryan Gardner 1/20/10
√	TL	2	This device appears to be constructed by three separate PCB's that interlock with each other. Are you sure this application is for singular modular approval? Item 3 below clears it up -it is a limited modular approval he is seeking. COK 21Jan10	Yes, The other two PCBs are only support equipment. To exercise the EUT. Yes, It is a module.	A del Angel / 01/21/10
√	TL	3	The motherboard or largest PCB appears to be missing its bottom sides in the photos submitted. Please insure that complete photos are submitted of both the tops and bottom sides of each separate PCB that makes up the device. I can't see where the shielding is located. OK-C Kendall , 21Jan10	The smallest PCB is not detachable, I cannot take the bottom picture. Regarding the shielding, this is the customer response: As I understand, with a limited modular FCC listing, the host product is sufficient to provide the shielding after the FCC finds the final product in compliance with either a general emissions test, or full product certification. This radio will never be sold as a standalone item or to a third party. It will be installed in only INNCOM products at our factory, and only handled by INNCOM employees.	A del Angel / 01/21/10

√	C	4	<p>Please annotate on the block diagram submitted the frequencies of each sub block on the block diagram. The schematic shows at least two clocks: X₁(32 MHz) and X₂(32.768kHz) and there is an output in the frequency range of 2405 – 2476.5 MHz.</p> <p>Confirmed that the answer is on page 3 of the provided exhibit. CKendall-1/26/10</p>	<p>New Block Diagram and Operational Description provided.</p> <p>I added the statements to clarify functionality of X1, and X2 in the schematic on page 3.</p>	<p>Ryan Gardner 1/20/10</p> <p>Ryan Gardner 1/25/10</p>
√	TL	5	<p>When I calculate the power presented in test report FC09-171A using page 42 of 55 pages, I get a lot less than what is reported in this test report. Additionally, why is the output power only listed under Band-Edge in this report and not under the section titled, "15.247(b)(3) RF Power Output?" I used 107.9 dBμV/m @ 3m as the highest output power since this was the only data sheet in the report that stated this.</p> <p>Where are the datasheets for the output power? OK-C Kendall , 21Jan10</p>	Updated Report Provided.	Jeff Gilbert 1/18/10
√	C	6	<p>Please include statement in the User's Manual regarding safe separation distance of at least 20cm from all persons along with the statement regarding that the transmitter must not be co-located with any other antenna or transmitter. OK-C Kendall , 21Jan10</p>	Updated Users Manual Provided.	Ryan Gardner
√	TL	7	<p>Please profide an MPE report for this application. OK-C Kendall , 21Jan10</p>	MPE Report Provided.	Jeff Gilbert 1/18/10
√	C	8	<p>For a Class B digital device or peripheral, the instructions furnished the user shall include the following or similar statement, placed in a prominent location in the text of the manual:</p> <p>This equipment has been tested and found to comply with the limits for a Class B digital device, pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference in a residential installation. This equipment generates, uses and can radiate radio frequency energy and, if not installed and used in accordance with the instructions, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try to correct the interference by one or more of the following measures:</p> <ul style="list-style-type: none"> -- Reorient or relocate the receiving antenna. -- Increase the separation between the equipment and receiver. -- Connect the equipment into an outlet on a circuit different from that to which the receiver is connected. -- Consult the dealer or an experienced radio/TV technician for help. <p>Ref: 15.105(b)</p>	Updated Users Manual Provided.	Ryan Gardner 1/20/10

		He now states compliance with 15C only- C Kendall-21Jan10.		
✓	C	9 Please provide a signed General Agreement. OK-C Kendall , 21Jan10	Signed General Agreement provided.	Ryan Gardner 1/14/10
✓	C	10 Please provide us with a signed copy of the Anti Drug Letter signed by Ryan Gardner. We have one signed by Mr. Roosli but he is not authorized. OK-C Kendall , 21Jan10	Anti-drug letter signed by myself Provided.	Ryan Gardner 1/20/10
✓	C/TL	11 The external photos exhibits are required. The internal photos have been placed in this field. OK-C Kendall , 21Jan10	There are no external photos. Unit was tested as shown in the pictures. It is a module.	A del Angel / 01/21/10
✓	C	12 Please note that the grantee code information must list the party responsible for compliance, including the contact name. Please update your grantee information to include a contact name. Please note that the contact name is the person authorized to sign form 731 applications and confidentiality letters. This authority may be delegated or assigned as necessary however the delegation of authority must be provided in the form of a letter and attached as part of the application filing. This application cannot be approved until the Grantee code contact name is updated. OK-C Kendall , 21Jan10	This was an older copy of the Grantee Information. Ran a NEW search for INNCOM International's Grantee information and Ryan Gardner is listed as the Grantee Contact. New Confirmation document on file.	Jessina Hunter 1/14/10
✓	C	13 The confidentiality letter provided requests confidentiality for internal photos. This request can only be granted with direct FCC permission. Without further documentation and justification of the request, it is highly likely that the present request would be rejected. Please also note item 1; for modular approval, external photos remain required and must be provided (eg, they're the same as the internal photos). Internal photos may not be held confidential for commercial products. Please either remove internal photos confidentiality or provide further justification for holding internal photos confidential (example: the equipment will be locked behind a door not accessible to the general public and the enclosure requires the use of specialized tools to open the equipment; service is performed by factory trained personnel who have signed non-disclosure agreements or will be performed by Employees of INNCOM) I now have two confidential request letters – one for permanent without internal photos and one for temporary with internal photos. C Kendall 21 Jan10.	Updated Confidentiality Letters Provided.	Ryan Gardner 1/21/10
✓	C	14 The operational description provided contains the "manufacturing tests" information. This item is not a suitable substitute for an operational description. In accordance with 2.1033(b)(4), please provide an overall description of the equipment and a detailed description of the product,	New Block Diagram and Operational Description provided.	Ryan Gardner 1/20/10

			including modulation, ground planes and antennas. OK-C Kendall, 21Jan10		
✓	C	15	The users manual must provide information to the user on final users manual statements and labeling requirements. Please add statement required by 15.21 to this users manual and provide directions for final labeling in accordance with 15.19, 15.21, 15.27 and 15.105 (if required) OK-C Kendall, 21Jan10	Updated Users Manual Provided.	Ryan Gardner 1/20/10
✓	TL	16	Due to item 5, please update RF Exposure information accordingly. OK-C Kendall, 21Jan10	MPE Report Provided.	Jeff Gilbert 1/18/10
✓	C	17	Comments regarding item 15: users manual statements. Updated users manual states “FCC Part 15b listing” This terminology is confusing. The relevant rule parts are actually FCC Part 15C, or more explicitly stated FCC Part 15.247. OK-C Kendall, 21Jan10	Updated Users Manual Provided.	Ryan Gardner 1/20/10
✓	C	18	Continuation from 17: Users manual uses the term Listing which is not consistent with the approval type. The term “Certification” is used to represent the necessary equipment authorization. OK-C Kendall, 21Jan10	Updated Users Manual Provided.	Ryan Gardner 1/20/10
✓	C	19	One element to be covered in the users manual are statements required for this product, however each final product released will need like statements. A statement, attestation or example is needed for compliance. Note: The statement can be simple, such as the following suggestion “The following paragraphs are pertinent to this equipment and are to be included within the users manual for all final products. The two part warning is required to be placed on the exterior of all final products, or if the final product is too small within the users manual.” Additionally, if the final product is a computer peripheral, the statement required by 15.105 (a) or (b) as appropriate is also required in the final product’s users manual. Instructions to this effect should also be included in the radio product’s users manual. See attached at Left. OK-C Kendall , 21Jan10	Updated Users Manual Provided.	Ryan Gardner 1/20/10