



## Washington Laboratories, Ltd.

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4840 Winchester Boulevard Suite 5 Frederick Maryland 21703  
9055 Comprint Court Gaithersburg, Maryland 20877  
(301) 216-1500 [info@wll.com](mailto:info@wll.com)

March 25, 2020

Greg Czumak  
American Certification Body Inc.  
6731 Whittier Ave  
McLean, VA 22101

RE: Comments of March 24, 2020

APPLICATION: Crown Broadcast A Division of International Radio and Electronics Corp.

FCC ID: JLOFM300  
IC ID: N/A

Greg:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in bold italic. Many responses refer you to additional exhibit(s) which has been uploaded to the application folder at the ACB website.

Thank you for your attention. Please feel free to contact us for any additional information that you may require.

Regards,

Kimberly Colbert  
Administrative Assistant

Regarding the line entry information on p.3 of the Form731, please note that:

- a. The frequency range should be listed as 87.9 – 107.9 MHz.
- b. The Frequency Tolerance limit for this device is 2000 Hz – this is the value that should be listed here, rather than 1000 Hz.
- c. Based on the OBW plots in the test report, the emission designator should be 165KF8E.
- d. The Rule Part under which the EUT is being certified is Part 73 (as noted in the test report), and not Part 74.

**R. The above corrections have been made, please see Form 731 Rev1**

One last issue re the referenced Crown application – now that Verification has gone away, the various (Class A) digital circuitry in this device is subject to either SDoC or Certification. Please indicate which will be employed. If SDoC is chosen, please also confirm that the information to the user required by Section 2.1077(a) will be included in the Manual, or a separate document, by the time that the EUT is marketed. If Certification is chosen, the EUT becomes a composite device, and a separate 15B test report, with ports filled per C63.4, etc., must be submitted (there would also be an additional charge for the Class A Digital Device certification).

**From:** Mike Violette <mikev@wll.com>  
**Sent:** Tuesday, March 31, 2020 4:50 PM  
**To:** Gregory Czumak <gczumak@acbcert.com>; Cert <Cert@wll.com>  
**Cc:** projects@acbcert.com  
**Subject:** RE: ATCB025003, FCC ID: JLOFM300, Ref: Job# 16440

Hi Greg,

We're working an SDOC for Crown.

We'll remind them that the user information has to be provided.

Thanks!