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12 March 2009

RE: Worth Data, Inc.

FCC ID: JWSLT7001
Response to comments from 11 Mar 2009
NCEE responses are in blue.

1) The newly provided operational description uses 320 msec and 10 seconds between hops. It appears that this may be correct for a "per channel" EMC correction factor. However for RF exposure, we are concerned with true duty factor (i.e. TX on vs. TX off time worse case). It appears from the plots in the report that other channels are being transmitted on in the 10 seconds between hops back to the same channel. Not enough information is provided to determine actualduty factor for reviewing the appropriate RF exposure information. A preliminary estimate taken from some local channels nearby seen in the plots of Figure 12 suggest that maybe duty factor is >50%. If so, it is still likely possible that the manual would required RF exposure information to be included. However it is noted that the revised operational description provided January 28 mentions maximum 40 msec transmit (which doesn't appear to match report data of 320 msec) and a retransmit of 500 msec. However it is uncertain if this is source based for purposes of RF exposure. If not source based (controlled in software such that < 500 mec would not occur), then we need to look at the maximum transmit rate of the TX for purposes of RF exposure. Please review and correct as necessary. Depending on the final values obtained – note that RF exposure information in the manual may be necessary.

A new report "R073108-01-01D.pdf" has been uploaded including the following note in section 2.6:

> All data in this test report was measured using EUT firmware modified to allow continuous transmission. In normal operation, the unit is only capable of transmitting every 500ms, with a pulse length of 40ms. This is a function of the EUT firmware and cannot be changed by the user, limiting the duty cycle to a maximum of 8%.

This explains why data in the report did not match the duty cycle information in the theory of operation. RF exposure RFE073108-01-01A therefore should be used as it includes a duty cycle factor calculated from the information in the theory of operation. Please disregard RFE0731-01-01B for the reasons listed in the ATCB comment 1.