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

July 19, 2002

RE: FCC ID: KJ8WST-372BSW
Attention: Timothy Johnson

I have a few comments on this Application.

1 HP has stated that when the video bandwidth is less than one tenth the Resolution bandwidth the analyzer is averaging. Please note, the video bandwidth shown on page 19 of the report is less than one tenth the resolution bandwidth (actually it is less than one hundredth the RBW). This means that you are in the process of averaging the signal. While a true average does not take place until the video bandwidth is at 1 Hz, none the less, the analyzer is averaging the signal in the plot. This means that you are improperly reducing an already partially averaged reading by the pulse width modulation factor. This is born out by applying the correction factors and PWDC to the true peak reading shown in the OBW plot on page 33 (assuming this OBW plot was taken at 3 meters).

The peak reading shown on page 17 of the report is incorrect and according to the above concern with the OBW plot the device appears to fail. Please retest the device properly applying the pulse width averaging technique to the true peak reading of the signal as specified in ANSI C63.4 section 13.1.4.2. Please verify that the true peak reading is in compliance with the 20dB over averaged (pulse width averaged) reading.

2 The plots on page 29 and 30 have the same problem as in item 1. Please remember that the Pulse Width Duty Cycle averaging is done on and absolute Peak, not a partially averaged reading. Please proved plots showing the video bandwidths equal to or greater than the Resolution Bandwidth, thus placing the analyzer in a peak reading mode and not an averaging mode.

3 Please note that the comment in table 7 may be incorrect. It states that the digital circuitry is not used except to turn the transmitter on. However, the digital circuitry also provides the digital modulation fed to the base of Q1 at the same time it turns Q1 on. This means that the digital pulse stream from the processor is active the entire time the transmitter is active and is an integral part of the transmission itself. Thus, measurements from 30 MHz to 1000MHz appear proper. Also please note that digital device emissions measurements fall under 15.109 while transmitter emissions fall under 15.209. Please show that the device is compliant to 15.209 requirements. Alternately, please explain how the digital circuitry is disabled during transmission.

4 The manual is for a model KEP2-0000 wireless keyless entry system. The model in question is 5BWS-A372 garage door opener. The manual then appears to be for the wrong device. Please provide a manual for the device tested.

Dennis Ward

Dennis Ward
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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.