

American TCB

February 12, 2009

RE: FCC ID: KL7-650MR-V5

Attention: Tim Johnson

Please find our responses to your comments on this application below:

1) A brochure mentions integrated support for 802.1 a/b/g. This application does not appear to support and 802.11 TX. Please explain.

The 802.11 transmissions are provided by the Intermec CK61G Hand Held that Savi's SMR-650-216 is connected to. The brochure provided describes both products.

2) The 2 part statement information appears to only be found in the manual. The FCC expects that this is only allowed for devices smaller than 8x10 cm. Please provide information regarding the size of the device.

According to the report, this device is 7cm by 7cm by 2.5cm; therefore we only provide the label in the manual.

3) Formatting of the 19 page operational description appears to be corrupted on some pages. Please provide a corrected copy.

Uploaded a revised Theory of Operation.

4) Kindly provide a photograph of the monopole antenna connector or other information to show compliance to the unique antenna connector requirements.

Uploaded photos to show the reverse SMA connector for the Savi antenna.

5) Each test report should report 15.207 results since different reports are uploaded separately for each grant on the FCC site. Kindly update 15.209 report to include this information.

Uploaded revised reports with the CE test data included.

6) It appears that the SMR does not transmit utilizing 15.231(e) emissions and that this is only tags that may utilize this. Please confirm.

Confirmed. There is only data for 15.231(a) in the report for the reader. Only the tags will use a mode that operates under 15.231(e).

7) It appears from the data for 15.231/15.240 that the data above 1 GHz for average was measured using 1 MHz RBW and 10 Hz VBW. The average should be calculated for power settings using 14. Note that peak emissions appear to meet average limits so it appears peak vs. average data may be sufficient. Please review.

It appears that the 10Hz post detection averaging filter was too low a value in this case. We normally check to make sure the filter does not mask the pulse amplitude. Using the 4.4 dB correction factor for the duty cycle would have been better. The revised reports show peak levels compared to the average limit.

8) FYI...It would be desirable for data tables to clearly denote test distances used. Data tables themselves are not always clear on the measurement or corrected field strength distances.

We usually do not indicate a test distance unless it is different than the distance specified in the rule part. So for the 15.209 report, since we tested at a distance other than as specified in the rule, we noted the distance. We can see that it makes it easier to review the data when it is explicitly stated, so we are looking at changing our procedure to always include the test distance.

Regards,

A handwritten signature in blue ink that reads "David Guidotti". The signature is fluid and cursive, with a large initial "D".

David Guidotti  
Senior Technical Writer