

FCC ID: L2V-PT3
IC ID: 3989A-PT3
CT Project: p1310017

From: Chris Harvey

Date: June 18, 2013

1. This seems to be a portable, battery operated Satellite transmitter, which should be subject to SAR compliance, but no SAR RF exposure exhibit provided. Exhibits for 20cm separation Power Density calculation have been provided, but this seems inappropriate for this handheld device. Previous versions had very low duty cycles and therefore SAR testing was not required per justification.

CT – The RF exposure report has been updated to include additional detail regarding SAR exclusion.

2. Internal Photos do not show the overall construction of this device, but just the PC Boards. Please provide additional photos with the enclosure open and battery installed and removed....

Spot – Customer provided additional photos 6/18

3. The FCC form 731 indicated Equipment Class TNB, but TNT – Worn on Body is more appropriate.

CT – Form 731 corrected

4. You have supplied an FCC Part 15 Subpart B compliance report. Please note that because the labeling has the FCC DoC logo, it is assumed that this report is not included in this application and will not officially be reviewed. It is also noted that because this device has a USB port that can be used for powering the device, AC Conducted Emissions is required. If this device can also communicate through the USB port, then Class B Computer Peripheral compliance should be sought (test setup would include computer system per ANSI C63.4).

CT – The Part 15B report was sent in error, please disregard.

5. The report lists a Bandwidth Correction Factor of 3.2, but does not indicate how this is obtained or why it is used. Please elaborate.

CT – The bandwidth correction formula $10\log(\text{RBW}/\text{OBW})$ was used to determine the appropriate measurements considering the plots were taken with a 1MHz RBW. The test has been edited to include this information.

$$10\log(1/2.046) = 3.2$$

6. Also, the calculated EIRP uses antenna gains that look inconsistent across a 7MHz span (ranges from 0.60dBi to 0.09dBi). Please confirm antenna gain.

CT – The customer provided swept the antenna gain plots which were used by CTL.



7. The Reports document conducted measurements and a calculated EIRP. The Grant should list the conducted emissions as measured (precedent from previous approvals too), which is 19.74dBm, or 0.094W.

CT – The grant will list conducted power but most measurements from part 25 list the limits as EIRP. To maintain consistency within the test report fundamental EIRP is listed.

8. The Label indicates Model PT3, but the RSP-100 Appendix A Application Form and Appendix B Test Report Cover Sheet indicate model Spot 3. These models listed must match (even though there is a naming attestation letter).

CT – Appendix A & B have been corrected

9. The RSP-100 Appendix B Test Report Cover Sheet shows Emission Designator as 2M04G1D, but the Necessary BW should be rounded up to become 2M05. Please correct.

CT – Appendix B has been corrected

Response by: John Erhard & Alex Macon

Submitted by: Amanda Reed

Date: 6/20/2013