



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

February 23, 2009

RE: FCC ID: L5C960900T_ATCB007312

Attention:

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that the grantee code L5C belongs to a company named "Ansen Electronics Co". While your 731 form has the same address it states the grantee is "Aesen Electronics Company." Please correct the 731 form to show the correct grantee information.
2. Please note that in order to meet the MPE requirements the cable used must be at least 20cm long. There is no indication in the report as to the actual length of the hard wired USB cable used for this device. Please provide some evidence as to the length of the cable.
3. Please note that the 15B computer peripheral device portion of the application falls under 15.109 and 15.107 and does not fall under the limits of 15C for intentional radiators. As such testing for computer peripheral certification must follow the 15B sections and not the 15C sections. Please verify correctly identify the 15B rule parts used for testing radiated and conducted emissions of the computer peripheral device in this application.
4. Please note that part 15B computer peripheral devices must be tested as a computer peripheral device using the prescribed minimum configuration stated in ANSI C63.4 2003. Your test setup photos clearly show that the only device connected to the laptop was the EUT. This is not in accordance with the requirements of minimum system configuration when the EUT is not the host. Please note that this minimum configuration includes occupying the minimum required I/O ports during testing. Please refer to section 11.1.2.1. Please provide data in accordance with the minimum system requirements for EUT devices tested as a peripheral.
5. FYI - please note that part 15.249 is not for Spread Spectrum devices only but for any device in the frequency range that meets the requirements of 15.249. The report states 15.249 is for spread spectrum devices. While it is not necessary to change this report, please note that this reference is not accurate and should be changed in future apps as it improperly refers to the rules.
6. Please note that even though the device may be powered by the USB port it is still required that line conducted emissions be done. Please refer to sections 15.37(j), 15.107(d) and 15.207(c) which clearly states "Devices that include, or make provisions for, the use of battery chargers which permit operating while charging, AC adapters or battery eliminators or that connect to the AC power lines indirectly, obtaining their power through another device which is connected to the AC power lines, shall be tested to demonstrate compliance with the conducted limits." As this device obtains power and connects to the laptop which is connected to the AC mains, this device requires AC line conducted testing as both a computer peripheral device and an intentional radiator. Please retest and provide the required AC lines conducted test data per the above listed sections.
7. Please verify that this device only operates at 915.36MHz and is not capable of operating on other frequencies.
8. Please note that while the operational description gives the fundamental frequency it does not meet the requirements of 2.1033(b)(4). Please provide a more adequate description of how the transmitter works.
9. Please note that the block diagram does not provide information on the transmitter itself but on the overall system. Please provide a block diagram of the transmitter portion of this device.
10. Please note that the internal photos are unclear and not recognizable. Please provide internal photos that are clear and in which the important device components can be identified.
11. Please explain how the label is permanently attached to the device.

Dennis Ward

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<mailto:dward@AmericanTCB.com>

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. Except as described in §0.459, correspondence and responses 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.