

11 September 2006

Mr Waitt:

Below you will find our response to your comments.

1: Internal Photos: It is important that the internal photos of the device be clear. One of the photos is rather blurry. Please re-take the photos and provide.

A replacement for the photo in question has been submitted.

2: Please verify that the device was transmitting at 100% duty cycle for these tests – and the device is not transmitting a continuous train of pulses.

The device under test was operating at 100% duty cycle.

3: FCCC rules do not allow a spurious emission to be higher than the fundamental emission. The report indicates a fundamental level at 508kHz @ 53.51 dB<sub>BuV</sub> and a spurious emission at 530kHz @ 53.93 dB<sub>BuV</sub>. Please revisit this measurement – or confirm that the spurious emission is due to the receiver and present even when the unit is not transmitting. If this is the case it is not due to the transmitter. Please provide supporting data if this is the case

A statement was added to Page 19 of the report: "A measurement was made with the EUT not present at this frequency with the same setup. The level was found to be 53.54dB<sub>BuV/m</sub> (corrected), which is within 1dB of the level when the EUT was present. Since the emission is present without the EUT, it can be assumed that it is not emanating from the EUT." A revised test report has been submitted.

4: LABELLING:

The basic FCC "rule of thumb" is that if a device is smaller than the palm of the hand, the two-part statement of 15.19(a)(3) may go inside the manual.

One of the inconsistencies with the FCC is the exact definition of these various "rule of thumb". Everyone's hand palm is a different size because people have different size hands, however this device appears to have plenty of room on it for a label big enough to accommodate the FCC 2 part statement. Don't bet 100% on our guidance - it is our best understanding of the FCC rules at any specific point in time, but like all interpretations will also change over time.

If you or your client honestly feels that you cannot place the two part label on the device [see 15.19(a)(5)], because the device is too small, that is OK, but do be careful!!! If the FCC audits this device it is my opinion they will require that the label be modified to include the two part statement and placed on the device. If your client does not want the statement there because they feel it is "ugly", they will lose in any discussion with the Commission.

I strongly suggest that the label be modified to include the 2 part FCC statement. It is probably easier to do it now than later if it is requested by the FCC

The label, as it is presented in this application, is similar to a previously granted submittal. It is the feeling of the manufacturer that, in this instance, the labeling is correct and the 2 part FCC statement has been placed in the manual per 15.19(a). If at a future time the Commission requires a change then the manufacturer will comply.

Thank you very much for your consideration in this application. Please contact us if there are further comments.

Regards,

A handwritten signature in black ink, appearing to read "Doug Kramer".

Doug Kramer  
NCEE Labs