

Appendix A

Non-Conformities for US Radio Equipment Authorization

Non-Conformities FCC ID: O6XTG700 (CKC CS Ref # E08-000119-FCC-01)

The items listed below represent requests for information following review of this application for certification under United States (FCC) regulations. Further question may arise pending review of responses to these items.

OK	ID	#	Non-Conformity or Comment	Submitted Response	Respondent / Date of Response
	C	1	<p>Both 15.231(a) and 15.231(e) are listed on the application. However, 15.231(a) is " restricted to the transmission of a control signal such as those used with alarm systems, door openers, remote switches, etc. Data is permitted to be sent with a control signal ". The provided user manual and operational manual described the product as " Beacon tag transmitting a unique ID & data at pre-set intervals or at will by user" and " transmit its unique identification with a predefined time-interval," without the mentioning of a control signal.</p> <p>Please clarify how this product meets the "data is permitted to be sent with a control signal" requirement.</p>	<p>PI Sheet Provided in response to this question.</p> <p>Update PI sheets (family and individual) should address ID C #1, #4, #10, and #12</p>	Edward Gonsalves 12/8/08

			12/10/08: It is unclear whether a Control signal is always sent with data stream as required by 15.231(a). On page 12 of the user manual, please verify whether The ancillary data is the control signal while operating in “standard trans mission mode”? Likewise, please verify whether the Alarm bit is the control signal while operating in “Temper Alert mode” and lastly, please identify the control signal when the device is operating in Movement Alert Mode .		
C	2		<p>The confidentiality letter includes a request for temporary confidentiality for test report. This request is not legitimate per DA04-1705. Please provide a revised confidentiality letter</p> <p>12/12/08: New letter requested a short term confidential for 180 days after the Grant Date of Equipment Authorization. This request exceeds the 45 days limit per DA04-1705. Please revise the letter to comply with requirement and file an extention with the TCB at a later date.</p> <p>Also, the name of ther person signing the letter is not legible, please provide a letter with signature and legible signee.</p>	New Letter Provided.	Edward Gonsalves 12/8/08
C	3		<p>The porvided letter of confidentiality is signed by Salem Miyan. Authorised individual named in the applicants grantee code is Edward Gonsalves, where as on FCC Website, the contact person is listed as Bishop Chris.</p> <p>In accordance with FCC Policy (KDB 852134), please provide</p>	New Letter Provided.	Edward Gonsalves 12/8/08

		<p>all cover letters signed by the authorized individual named in the applicant's grantees code information or by an authorized designee.</p> <p>In the latter case, please also provide letters of authorization signed by the authorized individual designating the alternate(s). In all cases, a paper trail must be demonstrated leading back to the person named under the grantees code. Please note that there are three individuals involved in this case.</p> <p>12/12/08, confidential letter" TG700 Confidentiality Request - FCC - rev EMG - 12-07-08" is not signed, Please provide a signed "TG700 Confidentiality Request - FCC - rev EMG - 12-07-08" and a letters of authorization signed by the authorized individual designating the alternate(s). Comply with the original non-conformity.</p>		
C	4	<p>The provided operational description does not adequately describe how the device operates. Please provide an update operational description detailing the working principle of the device, including modulation, tuning circuit, transmit interval, modulation type, transmitter circuit and antenna</p> <p>12/10/08: PI sheet does not meet satisfy the non conformity. There is no mentioning of the working principle of the circuit. Unlike PI sheet which provide pertinent information for the user, an operation description for evaluation purposes shall be</p>	<p>A New Users Manual was provided.</p> <p>Update PI sheets (family and individual) should address ID C #1, #4, #10, and #12</p>	<p>Edward Gonsalves 12/8/08</p>

			include the working principal of the RF circuit, the function of key RF component, including modulation, tuning circuit, transmit interval, modulation type, transmitter circuit and antenna		
x	C	5	The provide block diagram does not provide sufficient oscillator information. Please provide a revised block diagram with frequencies of all the oscillator in the device clearly indicated at each block	A New Block Diagram was Provided.	Edward Gonsalves 12/8/08
x	C	6	Component X1 of the scematic diagram is not identified, please provide an update schematic diagram with the value of X1 properly labeled	A New Schematic was provided.	Edward Gonsalves 12/8/08
x	TL	7	The device is a portable equipment, please clarify whether the emission profile of three orthogonal orientations have been investigated	During preliminary investigations three orthogonal orientations were investigated and the worst case was test as stated in the test conditions of the data sheet.	Mike Wilkinson 7/15/08
x	TL	8	The setup diagram shows the product was tested with EUT antenna placed flat on a cart, please verify whether the surface of the cart is made of material with diaelectric constant near that of air	The cart is question is of non-absorptive/reflective plastic with dielectric constant near that of air.	Mike Wilkinson 7/15/08
	C	9	Page 6 of the user manual indicated that the transmit interval of L series can be configured to 0.4, 0.8, 1.5, 15 and 30 second	New Users Manual Provided Update PI sheets (family and	Edward Gonsalves 12/8/08

		<p>intervals and transmit interval of W series can be configured to 0.4, 0.8, 1, 1.5, 2, 5, 10, 15, 20, 30 and 45 second intervals as well as 1, 1.5, 2, 3, 5 and 10 minute intervals.</p> <p>Please elaborate how the product meets FCC15.231(a) (3) "Periodic transmissions at regular predetermined intervals are not permitted" and FCC15.231 (e)...In addition, devices operated under the provisions of this paragraph shall be provided with a means for automatically limiting operation so that the duration of each transmission shall not be greater than one second and the silent period between transmissions shall be at least 30 times the duration of the transmission but in no case less than 10 seconds.</p> <p>12/12/08: On page 12 of the user manual, under 1.4.1 it is indicated that under standard transmission mode the tag will transmit at regular interval, which does not meet the 15.231(a)(3) requirement, but place it under the regulation of 15.231(e). However 15.231 (e) has a one second transmission length limit and the silent period between transmissions shall be at least 30 times the duration of the transmission but in no case less than 10 seconds. The transmission length is not identified in the provided document; please verify whether the transmission length operating under standard transmission mode exceeds one second and also please verify whether the silent period meets the 30 times the duration of the transmission requirement.</p>	individual) should address ID C #1, #4, #10, and #12	
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x	TL	10	The test report did not demonstrate the device was tested with a fresh battery. Please confirm whether a fresh battery was used.	A fresh battery was used.	Mike Wilkinson 7/15/08
x	TL	11	The manual did not address changes or modifications to the equipment. Please provide an updated users manual incorporating the statement required by 15.21	Test Lab does not control the manual 12/10/08: revised user manual.	Mike Wilkinson 7/15/08
	C	12	The FCC logo on the case of the device is only applicable to products subject to authorization under a Declaration of Conformity. Please remove the FCC logo from the device and provide a revised FCC ID label photo.	New Label Photos Provided Update PI sheets (family and individual) should address ID C #1, #4, #10, and #12	Edward Gonsalves 12/8/08
x	A	13	Item 13 of the application is marked as a "composite device". Please verify whether this is a mistake and correct the application accordingly.	They do have multiple transmitters but there was a query that was opened with the FCC by Randy please speak with him to find out what the definitive answer is. They operate with 2 different specifications 15.231 and 15.231E but both of them can be filed under 1 equipment class. Therefore they can both be filed on one application under DSC if it	Mike Wilkinson 7/15/08 Randy Clark 12/8/08

				is a transmitter only DSR if it is a Transceiver. This NOT a composite as it's filed under the same equipment class.	E. Wong 12/12/08

The items indicated above must be submitted before processing can continue on the referenced application. Failure to provide the requested information within 60 days may result in application dismissal pursuant to Section 2.917(c) and forfeiture of the filing fee pursuant to Section 1.1106.

How to read the table:

OK column indicates closure by CKC CS.

ID column is for use with Agents to assist in identifying the probable source for closure.

A - Application issue

TL - Test lab issue

C - Client issue

R - Retesting may be necessary

column indicates unique or separate non-conformity items (note some items may be related).

Non-Conformity or Comment column indicates the evaluators specific question or comment.

Submitted response column indicates the response or a summary of the response provided.

Respondent / Date of Response column indicates the responding party or agent and the date of the response was either received or logged.