



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

April 10, 2002

RE: iSECUREtrac Corp.

FCC ID: IST2100NC (?)

After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) Please provide a FRN Number for iSECUREtrac Corp. This is now required for all Grantees - (reference MD Docket No. 00-205). To obtain an FRN online, visit the FCC's Web site at www.fcc.gov and click the Commission Registration System (CORES) link. For further assistance, please either refer to the FAQ at this same link; contact the CORES helpdesk at CORES@fcc.gov; or call the CORES helpdesk toll-free number: 1-877-480-3201.
- 2) The Grantee code "IST" does not match the Applicant listed on the 731 form (iSECUREtrac Corp.). A search of the FCC web site yielded a grantee code of "OAM" for iSECUREtrac, but a different address was listed than provided on the 731. Please explain and provide a corrected 731 form.
- 3) The PTU appears to receive signals from both the cuff bracelet and a GPS receiver. However it is not clear as to the intended purpose of the base station needing to transmit. For example, part of the submittal states that the base station receives information and broadcasts it to the PTU, while other information states that the PTU is carried with the cuff, making it seem like the base station is not necessary. Please provide better detail as to its function and purpose.
- 4) It is not clear what type of connections that the PTU and Base station contain from the external photographs. Please provide better external photographs addressing this issue.
- 5) The internal photographs are sufficient to show how the unit(s) are built. However detailed, clear, close up photographs (preferably one per page and showing both sides of each board) must be provide for all transmitter /receiver sections and if possible for each board within the device(s). Please provide these photographs and label each one appropriately as to their function, etc (i.e. it is not clear which part of the base is the transmitter and which part is the receiver).
- 6) Please provide a photograph of the antenna relating to the transmitter being certified.
- 7) It is not clear if the schematics provided include the transmitter portion being certified. Please confirm if this portion of the product is included in the schematics and where.
- 8) The confidentiality letter may only request which specific exhibits are requested to be held confidential (i.e. schematics, operational description, etc.). Only exhibits containing trade secrets, proprietary information, or sufficient technical information may be considered confidential. Additionally, the internal photographs may not be held confidential, but you may use a black marker to "black out" the top of any readable components if you wish. Please provide a new confidentiality letter as well as new photograph exhibits if you desire.
- 9) Please provide a block diagram for the RF circuitry that includes the frequencies as specified by CFR 2.1033(a)(5).
- 10) The FCC ID labels provided in the application must be legible. Please provide a better exhibit for the PTU label as the information contained on this label is not readable. Additionally, please show where the FCC statements specified by 15.19 and where is the FCC ID as specified by 2.1033(7) & 2.925 are located. The appropriate statements and FCC ID should be located on the main control unit/base (which contains the transmitter portion of the product requiring certification). It would also be recommended that the statements (not the FCC ID) should be contained on the PTU since it is a separable unit.
- 11) The data presented in sections 4.3 & 4.4 of the report do not show any correction factors. Please confirm if the Levels provided in these tables are corrected for the measurement system, such as antenna factors, cable loss, amplifiers, etc.

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- 12) Does the repeater do any decoding, or does it strictly repeat any received information at 318 MHz. For instance, what happens if the user has a garage door opener that happens to work at 318 MHz as well?
- 13) The test report does not contain any information regarding RBW and VBW settings of the test equipment for conducted and radiated measurements or justification for the highest frequency measured to. Please explain what settings were used for the following tests:
 - a) Conducted emissions from 450 kHz to 30 MHz
 - b) Radiated emissions from 30 MHz to 1000 MHz
 - c) Radiated emissions above 1000 MHz
 - d) What was the highest frequency tested to
- 14) The measurements above 1 GHz must be shown for both peak and average conditions. The peak measurements must meet with the requirements specified in 15.35. Also, there is concern with the 2.862 GHz data and methods of measurement. Please call me to discuss.
- 15) The test report states that the unit was tested to 15.231(e). To meet the requirements of this section, the unit must be designed to automatically limit operation such 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 transmissions, but in no case less than 10 seconds. This limitation must be integrated into the device and can not depend on the cuff transmission. Please explain how the device accomplishes this.
- 16) FYI, please note that once the requested information above has been provided, additional questions may still be necessary.
- 17) FYI, this certification only pertains to the RF certification requirements under part 15 and does not cover any applicable Part 68 requirements that you may have.
- 18) FYI, RF Exposure information is not required for this type of submittal. We will not review information submitted for this exhibit.



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Examining Engineer

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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. Correspondence 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.