



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

November 13, 2007

RE: ATCB005616

FCC ID: P29EDT88RFM20707 for E-Drive Technology, Ltd.

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

1. Please confirm whether or not modular approval is being sought for this transmitter. If it is, a cover letter must be submitted describing how it meets the 8 conditions necessary for modular transmitter approval contained in FCC Public Notice DA1407-2000 (copy attached). If it doesn't meet all these conditions, it still may be eligible for Limited Modular Approval (LMA), but you need to request it in the cover letter.
2. Please provide justification for not providing AC line conducted emission measurements showing compliance with Section 15.207 of the FCC Rules especially if you are seeking modular or LMA approval of this transmitter or provide these measurements. Information indicates it operates on 12 VDC but it also connects to a personal computer so it is not always used on-board a vehicle or strictly powered by a battery.
3. Please provide justification for keeping the user guide confidential. Normally user manuals or guides are provided with every product sold. The submitted user guide does not look like it contains confidential information.
4. Please provide test setup photos of the radiated emissions tests as required by Sections 11.6.2 and 10.1.12 of ANSI C63.4 2003. The FCC considers this a requirement for all Part 15 transmitter approvals.
5. Please provide a letter from Eyal David, the Grantee Code contact person for E-Drive Technology on the FCC Website, giving Amir Badian permission to represent E-Drive Technology before the FCC. Alternatively, Amir Badian may be listed as the contact person on the FCC Website by having the FCC Website updated. For help updating the FCC Website, please contact Ms. Marianne Bosley of ATCB by email at [Marianne@atcb.com](mailto:Marianne@atcb.com).
6. The internal and external photos of this device show a different antenna than is shown in the rest of the supporting documentation (antenna information exhibit, label location exhibit, operational description exhibit and user guide exhibit). Please address this discrepancy by replacing the incorrect exhibits.
7. Please describe how soldering the antenna to the external antenna connector on the device meets the antenna requirement of Section 15.203 of the FCC Rules.
8. Please confirm that the radiated emission levels were maximized as specified in Section 13.1.4.1 of C63.4 by: (1) testing the transmitter in 3 orthogonal axes and (2) adjusting the transmit antenna in different orientations during these tests.
9. For Your Information – The test report is lacking several important items which the FCC looks for when reviewing measurement results. The range over which radiated emission measurements were performed. The polarity and height of the receive antenna that produces the worst case results is not indicated in the test results. The orthogonal axis orientation of the

transmitter is not indicated in the test results. There is no calculation showing all the correction factors used in determining the final field strength of the strongest emission (e.g., antenna gain, cable loss, amplifier gain, etc.). Please revise your test results to indicate these items in future test reports.

A handwritten signature in dark ink, reading "Richard Fabina". The signature is written in a cursive, flowing style.

Richard Fabina

Examining Engineer

[mailto: rfabina@AmericanTCB.com](mailto:rfabina@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. 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.