

Response to TCB findings

FCC ID: PEYBLADE2

Hi Mark,

We have reviewed the application and have identified the following issues:

1. The processing gain (PG) data is for a different device than that for which certification is sought. The FCC has stated that processing gain data is dependent on layout and component selection. Data from the chip set alone is not enough to prove compliance. If generic data from a different device using the same chipset is to be accepted, a letter must be provided which states that the layout and all component values in the RF path are identical in the device for which data is presented. Please submit PG data for the device or submit a letter which documents that the device is identical to the device measured for processing gain. We did note the comments in your email.

Response: The applicant provided the email below:

Barry,
attached is the response from Joe Dichoso to Chris Neal (Cambridge Silicon Radio) regarding the processing gain of the BC01 radio modem/ baseband chip. This email is the response to the one that Neil Evans forwarded to you last week. Hope this helps.

Regards.

Mark B

> -----

> From: David Frost
> Sent: Monday, November 12, 2001 18:15 PM
> To: Nick Moss (E-mail)
> Subject: FW: Processing gain
>
> Nick
>
> Here is an email from Joe to Chris
>
> If this is no good Chris has said he will go back to Joe
>
> Best Regards
> Dave
>
> -----Original Message-----
> From: Chris Neal
> Sent: 12 November 2001 18:08
> To: David Frost
> Subject: FW: Processing gain
>
> -----Original Message-----

> From: Joe Dichoso [mailto:JDICHOSO@fcc.gov]
> Sent: Friday, August 10, 2001 5:33 PM
> To: Chris.Neal@csr.com
> Subject: Re: Processing gain
>
>
> Hello Chris,
> Yes transmitters that are identical will have the same processing gain.
> If a device utilizes the same transmitter that has already been approved.
> The processing gain exhibit can be copied from the original file. A cover
> letter indicating so, should be provided with the copied document to
> explain
> the copied material.
>
> >>> Chris Neal <Chris.Neal@csr.com> 08/06/01 11:45AM >>>
> Joe
>
> Good to talk to you just now. During our conversation we discussed the
> top
> level architecture of a Bluetooth module built with CSR's BC01 chip. We
> talked about the fact that a module's Bluetooth functionality is
> completely
> determined by the BC01 chip which features an integral transmitter,
> receiver
> and the processing gain filters. All BC01 based modules will therefore
> have
> identical processing gains.
>
> A processing gain report for a BC01 module has already been filed and may
> be found on the FCC's website under FCC ID O2Z-BT2. You have proposed
> that
> this report be reused for future submissions covering new BC01 based
> modules. Adopting this approach will save having to repeat the processing
> gain measurements.
>
> In line with the above and your recent Bluetooth exhibit (guidance note),
> I
> propose to advise our customers that their FCC submission file for BC01
> should contain module specific evidence for:
>
> 1) The occupied bandwidth in Section 15.247(a)(1)(ii).
> 2) Conducted output power specified in Section 15.247(b)(1).
> 3) EIRP limit in Section 15.247(b)(3).
> 4) RF safety requirement in Section 15.247(b)(4)
> 5) Spurious emission limits in Section 15.247(c)
> 6) Power spectral density requirement in Section 15.247(f) in the
> acquisition mode.
>
> Our customers should append to this a pdf version of the processing gain
> report taken from FCC ID O2Z-BT2 together with a brief explanation of why
> the processing gain of their module is identical to that of other BC01

> equipped modules - along the lines outlined above.
>
> I believe this is what we agreed. Please could you confirm or otherwise
> by
> return email.
>
> Thanks once again for taking the time to follow this through with me.
>
>
>
>
> Chris Neal
>
>
>
>
> *****
> The information transmitted is intended only for the person or
> entity to which it is addressed and may contain confidential
> and/or privileged material.
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2. Please split the photos exhibit into 3 - external, internal and test setup. As the file is protected I was unable to do this.

Response: Separate files provided.

Best regards

Barry C. Quinlan
Certification & Telecom Manager

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