

Response to TCB questions

Hi Davida,

We have completed our review and have identified the following issues:

1. Please provide data responsive to 15.31(e) fundamental field strength under voltage variations.

Response – New radiated emission data supplied with note regarding voltage variation.

2. Please provide configuration data on the cables other than power that were connected to the EUT during testing.

Response - The connecting cables are 3 meters long, power cable being 16 awg three twisted wires to supply voltage to equipment, and the other is RSS232 4 twisted pairs for ethernet connection. Both cables are integrated into one connector which attaches to EUT.

3. Please provide a bandwidth photo of the emission.

Response – bandwidth photos supplied.

4. We cannot tell if this is a field disturbance sensor as defined by the FCC from the documentation. It may just be a regular radio transceiver. Please justify based on it's operation why it should be considered to comply with the definition of "field disturbance sensor" in 15.3

We direct your attention to the following FCC interpretation (particularly the last sentence): INQUIRY: We have a request to certify a 2.45GHz device under 15.245. The device communicates with tag transmitters which come into range. We think this is not a field disturbance sensor and is therefore excluded from this section by 15.245(a). Please confirm that RF communications capacity with another device is not allowed by field disturbance sensors unless specifically called out (for example in 15.253(a)). RESPONSE: Data transfer is possible only with FDS systems using passive tags and only if the data transfer function is ancillary to the primary purpose of a FDS system which is the detection of the presence of people or objects. Back scatter modulation is the method by which data is transferred from the tag to its associated reader. A System with a self-powered tag with its own frequency determining circuitry, capable of transmitting back to an interrogator on a frequency which is independent of the interrogation signal is not viewed as an FDS system."

Response - The purpose/function of the MD5850 Multireader is to detect and identify vehicles passing the in the field. The tag (transponder) only respond with its ID number. The tag is a passive back-scatter type (it modulates the carrier from the Multireader),

and can not transmit other frequencies. We do have FCC approval for a similar reader:
FCC ID: LX4TRMI.

5. Please confirm that there should be a hyphen between grantee code and the product code as the form 731 has it missing.

Response – new form 731 supplied.

6. Grantee code PYG is not recognized by the FCC database.

Response – grantee code is now recognized by the FCC database.

7. Please supply the label material details.

Response - The label material will be a concrete tape and the material resist in temperature up to 150 degree Celsius. If required they can also use a metallized label.

8. The installation manual does appear to have the 15.21 caution against modification statement.

Response – new manual supplied.

Best regards

Barry C. Quinlan
Certification & Telecom Manager

Curtis-Straus LLC Voice: 978.486.8880 x270
527 Great Road Fax: 978.486.8828
Littleton, MA 01460 <http://www.curtis-straus.com>
