03/02/02

Mr. Greg Snyder

In reference to FCC ID: PYN22002A

Mr. Snyder

Upon completion of review of the application for FCC ID: PYN22002A, there are several issues that must be addressed before the application can be granted by ATCB.

Please address each issue below.

1) Please provide a legible copy of the Theory of Operation – the copy provided is extremely hard to read.

R. Please see exhibit "Improved Theory of Operation.pdf"

2) The 731 form states this is a 15.231 device operating at 434 MHz, the theory of operation appears to state that this device is for data transmission. In accordance with devices operating under the provisions of 15.231 (a), these devices are prohibited from sending any type of data other then recognition codes. Please explain how this device meets the 15.231(a) rules.

R. The unit only transmits a control signal at 434 MHz to the 27MHz transmitter device (separate certification) which is located on a utility truck/van.

3) The system appears to be possibly a composite system with receiver and digital portion, please provide a copy of the Declaration of Conformity for this system or a set of test data for the report of this if this is correct.

R. The hand-held 434 MHz unit only has digital circuitry that is associated with its operation and is to be certified as a single unit with one FCC ID.

4) Reviewing the user manual – there are several questions that arise.

R. The following description should address the questions A through H.

The 434 MHz handheld unit is to be certified as a single unit under FCC ID: PYN22002A. This unit only contains digital circuitry and the circuitry for the 434 MHz transmitter control signal. The 434 MHz receiver is located in a separate box which also contains a 27 MHz transmitter. This device, which is located in a vehicle (typically a utility truck or construction type van) will be separately certified (FCC ID: PYN12002A).

The handheld unit (FCC ID: PYN22002A) contains an "F" type coaxial connector which connects directly to a 75 ohm coax cable at the entrance of a house or at the local tap. The user's guide that was uploaded with the application refers to the handheld unit as the "receiver" or "Qualifier Receiver". Page 13 shows a block diagram of the "receiver" which contains the 434 MHz transmitter. The term "receiver" within the manual is only used here as it refers to the operation of the overall system in terms of the integrity measurements the system is performing.

A preliminary product literature has been uploaded to help depict the overall function of the system.

A) The manual describes a composite system consisting of two transmitters and a receiver. These devices should be certified together either under one FC ID or if as separate packages you need to modify your 731 for question 7b and answer yes to question (b) since according to the manual it is marketed or used together.

R. Separate units.

B) The manual makes no reference at all to the 434 MHz transmitter or operating parameters of it, is this the correct manual?

R. This is the correct manual which will be supplied for the system.

C) The manual describes a 27 MHz 5 W transmitter. Is this the vehicle mounted system PYN12002A or something different?

R. This is the separate vehicle mounted unit and different application.

D) The 27 MHz transmitter operating at 5W would require certification under Part 90 of the rules, the application is for a 434 MHz transmitter under Part 15, Please verify this is an application for a Part 15 .231 operating at 434 MHz transmitter only?

R. Yes, this application applies only to the Part 15.231 unit.

E) Please verify that there is not a 27MHz transmitter in the handheld unit. If this is so, then this a co-located transmitter and cannot be certified by a TCB per the exclusion list.

R. The handheld unit does not contain the 27 MHz transmitter.

F) Is there a 27 MHz receiver in this unit?

R. No.

G) There appears to be an external antenna connection on this device, please provide information or a statement that the antenna connection is for the receiver portion only.

R. This connector is an "F"-type connector for direct connection to the 75 ohm coaxial cable of the house under test.

H) Please provide a copy of the FCC warnings in the manual about unauthorized modifications

R. Please see Page 2 of the "Qualifier Prelim User Guide.pdf" under the heading "Agency Notice".

Regards

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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.