



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

October 15, 2002

RE: FCC ID: QBK ETD-2740
Attention: Jeffrey Lenk, Nicole Golden

I have a few comments on this Application.

- 1 The label information does not specify what the label is made of and how it is attached to the device. Please provide this information. xxx
- 2 Please note that unless the ckt boards are 'potted' or otherwise prevented from being accessed or viewed by the user at the time of purchase, the internal photos cannot be held confidential. The board will be provided as not confidential unless it can be shown how this board will be potted and prevented from being exposed to view. xxx
- 3 You show the final transmitter section but have not provided any input as to the modulation circuitry used in the device. Please provide schematics of the entire transmitter device including the modulation circuitry. xxx
- 4 Please provide a theory of operation or a technical description of how the device operates. This is necessary to determine if the device falls into the requested part 15 section. xxx
- 5 Your manual states, "Any changes or modifications not expressly approved by CowTek, Inc for compliance could void your authority to modify the equipment." This is a misleading statement and does not present the intent of the FCC non-modification statement of 15.21. The statement is to notify users that unauthorized modification of the device may void the authority to use the device, not that it voids the authority to modify the equipment. Please correct the statement to reflect the intent of the FCC non-modification statement. xxx
- 6 The report does not indicate if the device was tested in the three orthogonal axis. Please provide data or an explanation as to testing all three orthogonal planes, xxx
- 7 The documentation does not appear to specify that the device meets the 15.231e rules pertaining to automatic limiting of transmission. 15.231 states, "In addition, devices operated under the provisions of this paragraph shall be provided with a means for automatically limiting operation so 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 transmission but in no case less than 10 seconds." Please provide evidence that the device meets this criteria.

Dennis Ward
<mailto:dward@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.



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

October 18, 2002

RE: FCC ID: QBK ETD-2740
Attention: Jeffrey Lenk, Nicole Golden

I have a few comments on this Application.

- 1 See item 7 from ATCB comments of 10-15-02. The theory of operation states that data is sent to the transmitter, "in a 1-5 second Three pulse (anti-collision) output. Please note that 15.231e states, "In addition, devices operated under the provisions of this paragraph shall be provided with a means for automatically limiting operation so 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 transmission but in no case less than 10 seconds." The description in the theory of operation would seem to violate this one second limit to transmission as well as disagree with the test criteria in the report.. Please explain. xxx
- 2 You have not addressed the modification issue of item 5 from the ATCB comments of 10-15-02. Please address this issue and clarify the intent of the required FCC non-modification statement. xxx

Dennis Ward
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