



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

October 18, 2002

RE: Telemics Inc.

FCC ID: QC5-09-MSS1

After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) Please provide photographs of each antenna listed in this application.
- 2) Please provide a block diagram for the TX portion of the device.
- 3) Devices that are modularly approved must meet the non-standard connector requirement (reference FCC da001407). Devices are typically approved as a module so that they may be sold to other companies desiring to integrate them or use them in other devices. Since Telemics Inc. can not control how the device is used or sold by other integrators, the FCC specifies that the device must incorporate non-standard connectors. Please confirm if you still desire to approve the device as a module, or provide information regarding what non-standard connector will be utilized in the device with the Omni-directional antenna.
- 4) Please provide close up Internal and External photographs of the device.
- 5) The phrase "This device contains Transmitter module FCC ID: QC5-09-MSS1" for the outside of any product the device is installed within should be contained on a single line. Please provide an updated label.
- 6) The FCC warning statements on the label placed external to the end product must match exactly as specified in 15.19. Please provide an updated label
- 7) Please provide a photograph or drawing showing label placement on the device.
- 8) The theory of operation states that the time slot is variable. Please explain if this is a single variable setting, or if the packet length is variable during "on the fly". If the time slots are variable "on the fly" please provide further detail on how all channels are used equally on the average.
- 9) Information in the users manual regarding the gain of the dipole antenna does not match the antenna information provided. Please explain.
- 10) The RF exposure requirements mentions a 30% duty cycle. In order to use duty cycle for general population RF exposure calculations, it must be "source-based" time-averaging based upon an inherent property or duty cycle of the device. Please either provide detailed information regarding how the duty cycle meets this requirement, or alternatively adjust the calculations assuming a duty cycle of 100% (2.1093(d)(2)). Please note that the device easily meets the 20 cm requirement at 100% duty cycle.
- 11) The users manual states "To ensure compliance, operations at closer than this distance is not recommended." Since this is not classified as a portable device, this phrase should be stated as ".....distance is not allowed."
- 12) The RF exposure statement in the manual are missing co-location information. Specifically the following should be added "This device and its antenna must not be co-located or operating in conjunction with any other antenna or transmitter".
- 13) Since the device is a transceiver, when the device is in a receive mode of operation, it must meet with the Part 15 Verification requirements for a receiver (these are equivalent to the class B emissions). Please provide this data.
- 14) Average measurements above 1 GHz must be made with a RBW = 1 MHz and VBW >= 10 Hz. The test methodology on page 19 of 43 states that the RBW was set to 1 kHz.
- 15) The test methodology for radiated spurious emission on page 18 of 43 states implies that the EUT was hop-stopped, while information on page 23 stated that it constantly hopped. Please explain as this test should be performed with the device hop-stopped.

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- 16) Please provide information to show compliance with 15.247(g) & (h).
- 17) FYI, The antenna warning information in the users manual is oddly worded when in mentions tested to 15.203.



Timothy R. Johnson
Examining Engineer

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