



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

July 23, 2004

RE: FCC ID: R8W-ZPL01_ATCB001524
Attention: Juan Martinez

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

FCC

1. FYI - Please note that the non-modification statement is not accurate. The statement indicates that any unauthorized modification will void the use of the device. Please note that this is not strictly accurate as only there are possibly modifications that would not affect the certification of the device. The correct statement should inform the user that such unauthorized modifications "may" void the user authority to operate the device not that it will void the authority to operate the device.
2. Please note that the applicant for this device appears to be Zelosity Corporation and not Innovative Golf Corporation. It would appear from the documentation then that Innovative Golf Corporation does not have the authority to make the non-modification statement. Please provide a manual with a non-modification statement from the responsible party for compliance of this device, or alternately, please provide evidence that Innovative Golf Corporation has the authority to make this statement.
3. Please provide the name of the technical contact on the 731 form.
4. Please note that the manual shows two transceivers and operational description states two transceivers. However, while the internal photos suggest the two are identical, it is not clear from the documentation if these actually are two identical transceivers or not. Please explain.
5. If these are two identical transceivers, do they operate on the same frequency or on separate frequencies? Please note that the 731 shows a 10MHz range while the test report only shows testing at one frequency. Please note that both the upper and lower frequencies should be tested in accordance with 15.31(m).
6. If the two transceivers are identical, it would be more appropriate to certify the one transmitter and label that transmitter. Then, as long as two or more transceivers were not collocated (within 20cm of each other) multiple transceivers could be installed in the system. Please note that certification is for A transmitter, not multiple identical transmitters. Please consider this in your application.
7. Please note that the report states a ferrite was required to be added to the USB cable. Please show this ferrite in the photos of the USB cable as attached. Please also include the appropriate instructions in the manual on installing this ferrite on the USB cable. Alternately, please show how this ferrite has been made a permanent part of the USB cable provided with the system.
8. Please note that radar signals are typically classified as pulsed operation. While the analyzer averaging technique described in the report works well for sinusoidal systems etc, it does not work for pulsed devices. As such any averaging of a pulsed system would be required to follow 15.35(c) whereby duty cycle is incorporated in the measurement. Please explain why this method was not used. Please provide compliance evidence in accordance with the requirements for pulsed systems indicated in 15.35(c).

Industry Canada

9. Please note that while the device may be of such power that MPE or SAR is not pertinent, Industry Canada has mandated that FCBs are to provide an RSS-102 rf hazard attestation letter from the applicant to IC. Please provide the required RSS102 attestation letter.

Dennis Ward

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.