



RE: FCC ID: R8W-ZPL01_ATCB001524

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.

Response: Understood. Manual has been revised to reflect this.

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.

Response: New Manual has been uploaded with the Zelosity name on it only.

3. Please provide the name of the technical contact on the 731 form.

Response: The 731 form has been revised to include the name.

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.

Response: They operate on the same frequency and are identical in design. Refer to Block diagram. The reason for the second is to provide additional detection coverage in case the main one is not able to detect the swinging of the club.

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).

Response: They operate on the same frequency and are identical in design. Refer to Block diagram.

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. [A point of clarification to item 6 about two identical transmitters. The FCC certifies transmitters not systems. As such, the transmitter itself would be FCC ID'd. The label would be on the transmitter. The system then would have two FCC ID'd transmitters attached to it.](#)

Response: We will only certify one transmitter and place two labels on the unit, per your recommendation. The transmitters are separated by more than 20cm. The actual separation distance is 50cm. Page 7 of the manual has a photo of the unit and points out the location of the transmitters.

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.

Response: Test configuration photos have been label to point that the ferrite was in place during the test.

As requested the manual will instruct the user to only use the supplied USB cable with the attached ferrite on USB. Refer to page 6 of the manual.

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).

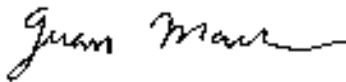
Response: Average readings have been removed. Peak readings are compared to the average limit and are well below the limit without using any duty cycle.

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.

Response: MPE exclusion statement has been included with the RSS102 form.

Regards,

A handwritten signature in black ink, appearing to read "Juan Martinez", with a stylized flourish at the end.

Juan Martinez
Sr. EMC Engineer