

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

November 14, 2003

RE: Luna iMonitoring

FCC ID: RIM-ICFR

I have a few comments on the above referenced Application.

1) The label include the FCC logo, which is assumed to be for the PC peripheral portion of the device. Note that the label is missing the "FOR HOME OR OFFICE USE" and "TESTED TO COMPLY WITH FCC STANDARDS" as given in 15.19. According to 15.19(b)(3) this information may be contained in the manual, however it could not be found. Please explain where this information may be found in the users manual.

Response: The EUT is exclusively used in industrial environments, such as oil and gas fields. The Part 15.19 language mentioned above was not shown on the EUT or the user's manual as this language would imply an operating environment that is not applicable.

2) Note that a device subject to a DoC is also required to be accompanied by a compliance information sheet . The Statement of Compliance page must also include the information specified in item (2) given below. Note that all information required on the compliance sheet must be on a single page. This information was not found per 2.1077. Please provide.

COMPLIANCE INFORMATION (47CFR 2.1077)

If a product is tested and authorized under a Declaration of Conformity, a compliance information statement shall be supplied with the product at the time of marketing or importation, containing the following information on a single page:

- (1) Identification of the product, i.e. name and model number.
- (2) A statement similar to that contained in Section 15.19(a)(3) that the product complies with Part 15 of the regulations.
- (3) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.

Response: Please see the compliance information statement uploaded with this response.

3) RF exposure results appear to miscalculated. We show that for 4 mW, 0 dBi antenna, that the results should be 0.0008 mW/cm². Please verify.

Response: The RF exposure calculation has been removed from the revised report. The EUT is excluded from SAR evaluation because of the low EIRP. Furthermore, the EUT power level is well below the 60/f(GHz) threshold on the TCB Exclusion List.

4) Please confirm that the spur at the bandedge just above 928 MHz is > 26 dB below the fundamental. Certain interpretations could consider this a portion of the fundamental emission and not just a spurious emission if the delta is < 26 dB.

Response: The signal shown on the plot was ambient noise. Another plot has been taken with the appropriate reference level. Please see the revised report uploaded with this response.

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5) Please explain the derivation of limits 81.3, 84.4, and 82.0 given in tables 9-2 through 9-4. These do not appear to be based on the results of the fundamental - 20 dB from section 6 of the report.

Response: The limit is based on 20 dB below the carrier. Since the unit has a bandwidth around 100 kHz, and the band edge plots are taken at 30 kHz, the level shown on the Band Edge would be lower.

6) The levels in 6 of the report for the fundamental appears to be 6-7 dB higher than the power reported for this device. Please explain.

Response: Please see the revised report uploaded with this response.

7) The results of 4639 MHz given in Table 9-4 do fall in a restricted band and are subject to the limits of 54 dBuV/m. Please correct.

Response: Please see the revised report uploaded with this response.

8) There appears to be an error in the peak data for 2783.466 MHz in table 9-4. Please verify.

Response: Please see the revised report uploaded with this response.

9) For purposes of Average measurements in section 9.3, please verify that the carrier was hop stopped and non-pulsing during these tests. If the device was not appropriately hop stopped with a non-pulsing carrier, then the use of the AVG detector using standard RBW = 1 MHz and VBW = 10 Hz may not be allowed.

Response: Hopping was disabled and the carrier was non-pulsing during these tests.

10) Since the gain of the antenna is known, the preferred method for measuring output power would be to utilize the far field equation as specified in the public notice instead of the substitution method. Please see attached measurement guidance notes.

Response: Please see the revised report uploaded with this response.

11) Please explain compliance of the EUT to 15.247(g)/(h) and 2.1033(b)(10).

Response: The frequencies shown in Table 1 of "2003153 Luna iMonitoring FCC & IC Test Report APX F FHSS.pdf" are the only frequencies used by the system. Additionally, the system receiver has an input bandwidth that matches the hopping channel bandwidths. This clarification has been added to the revised FHSS description ("2003153 Luna iMonitoring FCC & IC Test Report APX F FHSS.pdf") uploaded with this response.

12) Page 28 of the users manual shows a test mode that allows the device to be hop-stopped. The end user should not have access to such control of the device (15.15(b)). Please explain.

Response: The "Advanced Parameters Menu" and the "RF Test Menu" are no longer included in the "PocketConf" application software. Reference to these menus has been deleted from the Installer's Manual. Please see the revised Installer's Manual uploaded with this response.

Timothy R. Johnson
Examining Engineer
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.