

**From:** "Randal Clark" <randy.clark@ckccertification.com>  [Add to Address Book](#)  
**To:** monikabrandle@yahoo.com  
**Subject:** FW: Non-Conformities FCC ID: RKYOM-1 (Ref # E04-000018-1)  
**Date:** Tue, 9 Mar 2004 13:31:24 -0800

FYI...

Randal Clark  
Evaluation Engineer

CKC Certification Services  
4933 Sierra Pines Dr.  
Mariposa, CA 95338  
Phone: (209) 742-2378  
Fax: (209) 966-0857  
Email: [randy.clark@ckccertification.com](mailto:randy.clark@ckccertification.com)

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Certifications FAST! Go to <http://www.ckccertification.com> or  
<http://www.ckc.com/ckccs.htm> for more information.

-----Original Message-----

From: James Bare [mailto:[rifetech@rifetechnologies.com](mailto:rifetech@rifetechnologies.com)] Sent: Monday, March 08, 2004 8:57 PM To: Randal Clark Subject: RE: Non-Conformities FCC ID: RKYOM-1 (Ref # E04-000018-1)

Randy,

Thanks for looking into this for me. Will contact Analab tomorrow about the problem.

In the meantime here is what I've done about the defiencies.

>Item 1. Please provide a revised confidentiality letter. Photos can  
>not be kept confidential, the letter must be signed and the date must  
>be current.

Have made one up with new date, removed the words "pictures", and signed. Sent to your attention, also uploaded unsigned version to your web site .

>Item 3. Please provide a revised user manual showing compliance to  
>§18.213.

I checked this and it seemed OK, did resend. Compliance info is at very end of the user manual. Wonder if she was looking at the wrong file ?

>Item 5. Please provide a block diagram.

Did forget this, made one up and sent to web site tonight.  
>

>Item 6. Please provide a separate file for test set-up photos.

Placed all set up photos into one PDF file and sent this afternoon.

If there are any problems with these items, please let me know!

If for some reason I need to have a partial test done at Analab for frequencies down to 20 MHz will there be any problems with accepting the data? I would think an entirely new report would have to be written including the new test data?

Jim

>Regarding the question on Loop antennae, this question refers to the >use of a loop antenna for radiated measurements below 30MHz as >specified in ANSI C63.4 2000. The FCC has recently announced that they

>will not accept the use of Rod type antennae (including bicon or bilog >type) anywhere in this frequency range, despite earlier discussions of >allowing biconical antenna measurements within the range of 25-30MHz.

>

>The question stems from the test report from Analab, they claim that >the testing was performed from 20-400MHz, however they do not list for >their test equipment a magnetic loop antenna. You should contact the >testing laboratory and obtain clarification of the testing performed.

>When following the procedures listed in ANSI C63.4, a shielded balanced

>magnetic loop antenna should be used. Alternatively when following the

>procedures listed in FCC MP-5, within the frequency range of 18 to 30 >MHz, a shielded balanced loop or calibrated tuned half-wave dipole is >acceptable. Analab lists both of these measurement procedures in the >test report, however do not provide adequate documentation to >substantiate the claim.

>

>Please feel free to contact me if you have any further questions >regarding these issues.

>

>All Best,

>

>Randal Clark

>Evaluation Engineer

>

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><http://www.ckc.com/ckccs.htm> for more information.  
>  
>  
>-----Original Message-----  
>From: James Bare [mailto:[rifetech@rifetechnologies.com](mailto:rifetech@rifetechnologies.com)]  
>Sent: Sunday, March 07, 2004 10:20 PM  
>To: [info@ckccertification.com](mailto:info@ckccertification.com)  
>Subject: Re: Non-Conformities FCC ID: RKYOM-1 (Ref # E04-000018-1)  
>  
>  
>Hello,  
>  
>Will be happy to provide the following requests. Could you please  
>clarify a few points for me?  
>  
>  
>>The following items need to be provided before the evaluation for  
>>certification can be completed. If you have any questions please do  
>>not hesitate to contact CKC Certification Services at  
>>[info@ckccertifications.com](mailto:info@ckccertifications.com).  
>>  
>>Item 1. Please provide a revised confidentiality letter. Photos can  
>>not be kept confidential, the letter must be signed and the date must  
>>be current.  
>  
>I would therefore assume that if the material requested to be kept  
>confidential is placed in a MS word document file instead of a jpg  
>picture, that this would comply with FCC guidelines? If so will revise  
>to comply. Please let me know! Will send you a signed copy of letter  
>with appropriate revisions.  
>  
>>Item 2. Please provide a signed copy of the CKC General Agreement  
>>Letter.  
>  
>You should have this, will provide my copy.  
>>  
>>Item 3. Please provide a revised user manual showing compliance to  
>>B18.213.  
>  
>Wasn't this placed at the end of the user manual? Will check the file  
I  
>sent you. May have sent you an early version of the manual.  
>  
>>Item 4. The FCC requires the use of a loop antenna below 30MHz,  
please  
>>explain.  
>  
>Not certain what you mean. Do you mean for emission testing purposes  
or  
>for usage purposes ? If for usage purposes, loop antennas may or may  
not be necessary. For example.  
>  
>Diathermy device - loop  
>Induction heater or welder - loop  
>Laser driver - non loop, direct attachment fired through electrodes.  
RF  
>pulsed field therapeutic device - gas plasma tube. Tubes are fired

>through internal electrodes necessitating no loop, just direct  
>attachment to the electrodes.  
>  
>Maybe think in terms of the electrode fired tubes being akin to a  
>dipole? It is possible to light laser tubes and plasma tubes using  
>capacitive coupling wherein the tube is wrapped ( a loop on each end  
) .  
  
>Can provide pictures of this if required. Laser tubes however don't  
>tend to lase when wrapped in this manner. Sure do glow brightly  
though!  
>  
>>  
>>Item 5. Please provide a block diagram.  
>  
>Oops! Did forget to do this.Did send separate pictures of the various  
>sections.  
>>  
>>Item 6. Please provide a separate file for test set-up photos.  
>  
>Odd, I was told that the pictures had to be separate. Actually had  
them  
>all in one file originally for submission. Will place into one file.  
>  
>James Bare  
>  
>§ 18.213 Information to the user.  
>Information on the following matters  
>shall be provided to the user in the instruction  
>manual or on the packaging  
>if an instruction manual is not provided  
>for any type of ISM equipment:  
>(a) The interference potential of the  
>device or system  
>(b) Maintenance of the system  
>(c) Simple measures that can be  
>taken by the user to correct interference.  
>[50 FR 36069, Sept. 5, 1985, as amended at 51  
>FR 17970, May 16, 1986]