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**From:** "Randal Clark" <randy.clark@ckccertification.com>  [Add to Address Book](#)

**To:** "James Bare" <rifetech@rifetechnologies.com>

**Subject:** RE: Non-Conformities FCC ID: RKYOM-1 (Ref # E04-000018-1)

**Date:** Mon, 8 Mar 2004 16:16:48 -0800

Hello Jim,

Per our conversation earlier, I have asked Monika to review the confidentiality letter again and discuss any discrepancies with me regarding requested confidential material; please however have the letter signed and dated.

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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-----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  
>§18.213.

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]