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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

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Original Message----- From: James Bare

[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 deficiencies. >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 >B18.213. 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 > >CKC Certification Services
>4933 Sierra Pines Dr. >Mariposa, CA 95338 >Phone: (209)
742-2378 >Fax: (209) 966-0857 >Email:
randy.clark@ckccertification.com > >CKC Certification
Services provides US (FCC) and Canadian >Certifications
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><http://www.ckc.com/ckccs.htm> for more information. > >
>-----Original Message----- >From: James Bare
[mailto:rifetech@rifetechnologies.com] >Sent: Sunday,
March 07, 2004 10:20 PM >To: 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. >> >>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 pro-vided >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 inter-ference. >[50 FR 36069, Sept. 5, 1985, as amended at 51 >FR 17970, May 16, 1986]

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