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Date: September 10, 2004

RE: ARGUSTESAM ENTERPRISE CO., LTD.

FCC ID: SC2-M789

Answers to ATCB August 27, 2004 comments:

1) The 731 form shows an FCC ID: SC2-M789, while several of the exhibits show FCC ID: SC2M789. Is there a dash or not? Which is correct? Please correct all affected exhibits.

Answer: The correct FCC ID is "**SC2-M789**". We will also correct all affected exhibits.

2) The block diagram should show the frequencies of all oscillators in the TX device (CFR 2.1033(a)(5)). Please provide.

Answer: Please refer to the exhibit "**(M789)Circuit_TX-434(REVISE).pdf**".

3) Please confirm that confidentiality is NOT being requested for the Block Diagram or Schematic.

Answer: Please refer to the exhibit "**(M789)Confidentiality request Letter of Agency Authorization letter1(REVISE).pdf**".

5) Page 4 of the users manual mentions 2 antennas. Please explain as the remote control device appears to have an integrated antenna.

Answer: The two antennas are used for the receiver. There is only one **PERMANENT** and **INTEGRATED** antenna on the transmitter.

6) Users Manual appears to be missing the information required from 15.21 and 15.105(b).

Answer: Please find the exhibit "**(M789)TestRpt(REVISE2).pdf**".

7) These devices are typically a pulsed emission device (series of on-off pulses). The FCC does not allow Average measurements to actually be made. A peak to average correction factor must be made from the worse case pulse train (most TX) that can be obtained in any 100 msec period of time. For a sample report see FCC ID: FU5HA51M test report on the FCC site. This correction factor is then applied to the peak readings and compared to the average limits. Please correct the test report appropriately and provide the necessary duty cycle plots. Note in this case it may help show more margin.

Answer: Please find the exhibit "**(M789)TestRpt(REVISE2).pdf**".

8) Since the device is hand held, it must be placed in all 3 axis possible and tested for worse case. note that worse case for the fundamental will not necessarily be the worse case for the spurious. Please provide the missing data.

Answer: Please find the exhibit "**(M789)TestRpt(REVISE2).pdf**".

9) The spurious emissions limits used are not correct (pages 18, 19, 20, 21)). Note that the spurious emissions levels are based upon the frequency of the fundamental and NOT the frequency of the emissions measured (see 15.231(b)(3)). For instance, the spurious limits for this device would be 80.8 dBuV/m peak and 60.8 dBuV/m average for spurious emissions based upon a fundamental of 433.92. Additionally, if any emissions fall in a restricted band to table 15.205, the limits of 15.209 must be used if they are more stringent. This will affect the results reported at 111.54, 276.78, 123.69, 3906.01, and 4340.15 MHz. Please correct.

Answer: Please find the exhibit "**(M789)TestRpt(REVISE2).pdf**".

10) Much of the information on page 26 appears in Chinese. Please correct to English.

Answer: This page is for report generating. It is not any portion of the test report. We will delete it.

Answers to ATCB September 9, 2004 comment:

3) Please provide the additional plots for duty cycle to show the timing for the 0.4008 ms and 7.3146ms referenced in the duty cycle calculations.

Answer: Please find the exhibit "[\(M789\)Duty Cycle.pdf](#)"

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