Response to questions from the FCC

FCC response on 04/15/2013

Please address the following issues in the filing.

2. Please describe in the operational description the network interface shown on the block diagram. **Response: please see the accompanying document "Operational Description - Revised".**

3. Please describe in the operational description the communication demodulator shown on the block diagram. Describe the modulating signal and the carrier during the ping and power transfer phases. **Response: please see the accompanying document "Operational Description - Revised".**

4. In the MPE report, what is the operation mode of the client handset XT875 during test? Note that even in standby, the handset is still transmitting on the control channel. **Response: The handset was tested both powered on and turned off for worst-case, with a fully discharged battery. This condition provides the highest power to the primary coil and therefore the highest E & H-field measurements.**

5. MPE test data show off-center test positions with no definition. Those test cases are shown to result in up to 22 dB higher E/H measurements than centered test positions. Please add details. **Response: At the start of the testing process, it was seen that the radiated E and H fields from the EUT were increased as the load (client device) was moved off-center from the primary coil. Therefore, in order to show compliance during worst-case conditions, testing was performed with the load (client device) positions off-center as well as in its normal centered position. This off-center location was determined by observing the field strength levels while moving the load further away from the center position. Worst-case was determined to be at the location of the boundary where the charging signal from the EUT is lost. Off-center measurements were taken as close as possible to this boundary without losing the charging signal. For additional description of this operating state, please see the accompanying document "Operational Description - Revised".**

6. Please justify the omission of 15.207 compliance testing. **Response: This device is used exclusively as an Automobile Manufacturer OEM installed device. It cannot be used in any other application and will not be connected to an AC mains supply at any time.**

7. With a center frequency of 110.9 kHz, it is not clear whether compliance with 15.205 is achieved. Please elaborate or present test data. **Response: We've provided additional test data to show that the device, under all conditions (ping & minimum to maximum load), operates at a fixed frequency that is outside the restricted band. The band edge data also shows that the frequency of operation is not in the restricted band of 15.205. Test data is provided on the accompanying document "Exhibit Item 7".**