



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

August 7, 2006

RE: FCC ID: UAX-RPV1_ATCB003834 Attention:
Kathy Grzovic / Richard McMurray

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1 Please note that the rf exposure states that this device is kept 20cm from the body. Please note that while SAR is generally considered as a human subject requirement, it is not known how the FCC views devices worn by pets, wild animals etc. Consequently, the rf exposure document assumes only human proximity. As this device is designed to be worn around the neck or body of the pet, it is therefore not known if SAR tests would be required. A question to the FCC has been made to address this configuration. In the mean time, please consider the rf exposure issue and the possibility that SAR may be required. This means that the device would have to be tested in the host.

Response: N/A per FCC response.

2 Please provide the tune up procedure for this device or please provide an explanation as to why this device has no tune up capabilities. Please remember that the tune up procedure referred to is the factory tune up and not any tunable aspect on the user's part. Please also remember that the tune up procedure/notice is also a separate exhibit and is not considered part of the operational description.

Response: Please see the attestation letter uploaded with this response.

3 Please note that the documentation states the device is "mobile and fixed". However, it is not clear if the use in the 'fixed' host can in fact be worn on the person's body or if it is always placed 20 cm or more from the person. Please explain. Please also note that depending on the response from the FCC to the current inquiry, the device may be classified as portable.

Response: N/A per FCC response.

4 Please note that the operational description states, "When the module desires to transmit a packet..." However, this is not a clear indication that the device cannot transmit in continuous carrier transmit mode. Please note that part 95 states, "MURS transmitters may not be operated in the continuous carrier transmit mode." Please explain how the device meets this requirement.

Response: The modulation is FSK. The device does not transmit continually. The device listens in order to determine clear air, then only transmit for 80ms then waits for a predetermined period before attempting transmission again. This is done to avoid collisions and failed communications and preserves battery life.

5 Please note that on page 10 of the report the occupied bandwidth plot shows that in the upper sideband of the mask the signal may be at the limit and possibly over the limit calculated. Please review this mask and affirm that all emissions (especially the last signal on the downward slop of the $29 \log(f_d^2/11)$ just before the 50dBc section) are in fact below the limit.

Response: We affirm that all emissions are below the limit and have provide a revised plot. Note that the maximum emissions are just under the limit. Please see the revised test report uploaded with this response.



Dennis Ward
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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.