

November 14, 2006

RE: Wanco, Inc.
FCC ID: UQXWRDR432

The following is in response to the comments made on the above referenced application.

1) FYI....Please note the frequency listed on the 731 is MHz, not GHz.

Our apologies, typo has been corrected.

2) Please provide further internal photographs of the innoSenT module.

Photographs of the innoSenT module have been provided.

AC powerline emissions do not appear to be provided. Please explain. If the device is intended to operate from any source that can be traced back to AC (i.e. AC to DC adapter), then this should be tested. Additionally, given the terminals are simply wires, it is uncertain how this device can be controlled to battery power only by any user of the device.

Note: Section 15.207(c) REQUIRES AC line conducted test data to be submitted unless the device is strictly battery-powered. The last sentence of this regulation states that devices that include, or make provisions for, the use of battery chargers which permit operating while charging, AC adapters or battery eliminators or that connect to the AC power lines indirectly, obtaining their power through another device which is connected to the AC power lines, shall be tested to demonstrate compliance with the conducted limits.

The device in question is used at temporary, battery powered installations for detecting traffic speed along roadways. They are powered by 12 VDC lead-acid batteries (or occasionally a generator), and do not employ AC mains power. In addition, they are not used while the trailer/box they are installed in is towed/moved to alternate locations.

3) Part of the test report mentions 15.249. Please explain.

Typographical error. The test report has been corrected.

4) Given the nature of this design, it is uncertain how this device can assure compliance with 15.245 (b)(1)(iii). Please explain.

As mentioned above, the device in question is not used in a motor vehicle or aircraft.

5) The frequencies given on the 731 form appear to cover 100 MHz, but only one frequency appears to be tested. Normally FCC requires low/mid/high channels. Note Block Diagram and Operational Description support 24.125 GHz, but data suggests 24.113 – 24.115 GHz. Please explain.

The device being tested is a CW Doppler radar employing only a single channel of operation. The 731 Form has been updated to reflect only the exact frequency measured on this particular device. However, it is our opinion that the grant should give some leniency within the operating band for variations in the operating frequency of the RF module, as it utilizes a PHEMT oscillator and manufacturing processes will result in minor deviations from the specification. The manufacturer will ensure that all RF modules used remain within the permitted band of operation.

6) For IC it is uncertain if the RX emissions are covered by the results obtained. Results appear to be only for 50 dB down or for Class A emissions.

Please note that all spurious emissions measured above 1 GHz are below 54 dBuV/m, and all emissions below 1 GHz meet Class B emissions limits. Ref. Table 6.2. This demonstrates compliance for IC receiver requirements.