



Re: Monitron

FCC ID: V88-TRX876

Date: December 22, 2009

From: Chris Harvey

1. The Confidentiality Request Letter currently contains request for Full Confidentiality of some exhibits that the FCC does not customarily allow to be held confidential: Users Manual, External and Internal Photos. Please either amend the confidentiality request letter to request Short-Term Confidentiality (for up to 180 days) of these exhibits, or provide an FCC Knowledge database reference number of communications with the FCC allowing you to have full confidentiality for these exhibits.

[Revised/corrected Confidentiality letter has been provided](#)

2. The FCC allows Modular Approval of Transmitter Modules for Licensed Bands (such as Part 90). Please provide a cover letter which addresses the requirements of Modular Approval (of FCC 15.212) to show how this module complies when installed /used in hosts.

[FCC 15.212 document has been provided](#)

3. The RF Exposure compliance exhibit indicates that this device is a Portable device (used <20 cm separation to the body) has a 7% Source-based Duty Cycle, but does not provide any justification for that value. The Operational Description implies a maximum duty-cycle of 10%. Please provide a detailed justification of the applied duty cycle.

[The Tuning Procedure has been edited to reflect a transmission length of 70mS, which equates to a 7% duty cycle.](#)

4. The Users Manual contains the FCC of a previously approved transmitter (page 18 of 19 states FCC ID: V88-TRX777 and its technical specifications). Please update the Users manual, confirming that it is correct

[The user's manual has been corrected.](#)

5. Please provide the antenna specifications for this transmitter.

[The document detailing the antenna specification has been provided.](#)

6. Please provide justification of having the 'host' label inside its enclosure.

[The unit is placed underground and labeling of nearly any type would not be permanent on the outside of the casing. The FCC in a previous product with the same usage approved this labeling technique. The hand -held unit will have the labeling outside the casing.](#)

7. The emission Mask section of the report does not specify which Mask is used. It appears that Emission Mask B would be appropriate for this device.

[Per 90.210 Mask D is applicable for devices operating on 12.5 kHz BW. The unit was tested to Mask D and the test report has been edited to indicate this.](#)

8. The Test report does not mention the Measurement Standard used for making measurements. The FCC accepts measurements in accordance with EIA/TIA 603-C.

[This has been added to the test report on page 4.](#)

9. Please explain the -20dBm limit in the test report table on page 9 of 25.

[This is an error and should be -13dBm. The report has been edited accordingly.](#)



10. FCC 90.203(J)(3) states: Applications for part 90 certification of transmitters designed to operate on frequencies in the 150.8– 162.0125 MHz, 173.2–173.4 MHz, and/or 421–512 MHz bands, received on or after February 14, 1997 must include a certification that the equipment meets a spectrum efficiency standard of one voice channel per 12.5 kHz of channel bandwidth. Additionally, if the equipment is capable of transmitting data, has transmitter output power greater than 500 mW, and has a channel bandwidth of more than 6.25 kHz, the equipment must be capable of supporting a minimum data rate of 4800 bits per second per 6.25 kHz of channel bandwidth. Please provide such Certification of Compliance to the specific requirements above.

[A document from the MFG has been provided declaring compliance to 90.203\(j\)\(3\).](#)

Response by: John Erhard

Date: 1/4/10

Submitted by: Karen Springer