Joe Hsieh

From: Mucha, Bartlomiej <Bartlomiej.Mucha@ul.com>
Sent: 2011年10月25日星期二 上午 10:09
To: Joe Hsieh
Subject: RE: Philips Lighting Systems & Controls, //VBO-LRA1721 //AN11T0782
Attachments: FCC Agent Letter (Signed 102411).pdf; Occuswitch Confidentiality Letter(signed 102411).pdf; MC16433_11CA14755_20110519_PhilipsLighting_NA2Dimmer_Switch_01.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Joe,

Please see responses below. Let me know if this resolves the issues.

Bartlomiej Mucha
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-----Original Message-----
From: joe.hsieh@ccsemc.com [mailto:joe.hsieh@ccsemc.com]
Sent: Monday, October 24, 2011 2:41 AM
To: Mucha, Bartlomiej
Cc: joe.hsieh@ccsemc.com
Subject: Philips Lighting Systems & Controls, //VBO-LRA1721 //AN11T0782

Hi Bart

Please address following issues.

Q#1: The FCC ID at the FCC Agent Letter & Occuswitch Numbering Scheme Expanation letter are not correct. Please revise them.

A#1: The number scheme expansion does not have fcc id. You mean confidentiality request as second one probably. I will e-mail those as soon as I get them.

Q#2: This device includes a USB interface at internal PCB. Please address the function of this PCB port. Please identify this device uses DoC or Verification procedure for FCC Part15B rule.

A#2: USB interface is only for service and factory setup. It is normally not used when device is installed. Please see bottom of operational description.

Q#3: Test Setup Photo: Cannot confirm that the EUT is placed on platform raised 80 cm above the reference ground plane and the vertical conducting plane shall be located 40 cm to the rear of the EUT from the test setup photo. (The platform of EUT placed is inclined.) Please address that how the AC power-line conducted emission measurement setup is following the rule of ANSI C63.4 2009 (or 2003) section 7 requirements in the test report.

A#3: The height of the eut is approximately 80% (+/-10%) The vertical GP is 40cm away. Please see revised report with statement.

Q#4: Page 15 of the test report, Low Channel, Line 2, Frequency = 0.79918, QP Lever= 56.8, QP Limit of FCC15.207 = 56, Margin = 0.8. It's over the limit.
Page 18 of the test report, Middle Channel, Line 2, Frequency = 0.79068, QP Lever= 57, QP Limit of FCC15.207 = 56, Margin = 1. It's over the limit.
Page 23 of the test report, High Channel, Line 2, Frequency = 0.79341, QP Lever= 57.48, QP Limit of FCC15.207 = 56, Margin = 1.48. It's over the limit.
Page 29, 30, 32 and 33 have the same fail result.
Please address how to confirm these emission are not from the transmitter and won't to meet the requirement of FCC 15.207 rule.

A#4: Emissions generated by the switch and dimmer are product of the switching supply used within the device. To confirm this standby scan was conducted and emission levels were the same. This product is sold as commercial use only therefore for the digital part it can meet class A limits. Please see statement under the limit table. Normally such statement is sufficient.

Q#5: Page 35 and 71 of the test report, the calibration due day of Bicon Antenna is Dec. 31, 2010 and the test day is not include that day. Please address.

A#5: It's a typo, See revised test report.

Q#6: Please address the antenna array specification at page 45 of test report. Page 53, 56, 59, 62, 65, 68 show the test plots from 1GHz to 25GHz. Please address how to generate this plot by this antenna array.

A#6: BOMS antenna array is an assembly made of 7 different antennas. It has it's own control number within UL and when looked up all antennas are listed there. We never before had to list all those antennas as a individual ones. If we start listing all individual antennas then we will have to list every filter, amplifier, attenuator and cable that is involved in this assembly (about 40 to 50 different components).

Q#7: FCC Part15.247(d) mentioned:

In addition, radiated emissions which fall in the restricted bands, as defined in Section 15.205(a), must also comply with the radiated emission limits specified in Section 15.209(a) (see Section 15.205(c)).

But there is no below 1GHz radiated test result to meet the requirement of above rule in the test report. Please address.

A#7 Please see comments on page 44 under the limit tables.

FYI: The limit value and limit line of Antenna Port Conducted Spurious Emission (page 48-51) are not correct. But it's not affect the PASS result of this report.

Thank you.

Best regards,
Joe Hsieh / UL CCS

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee. 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 e-mail address listed below the name of the sender. Revised documentation should not be emailed, but instead should be submitted through "Add Attachment&#65533; function at the UL-CCS website. Please have your Assessment Number and FCC ID/IC Certification number handy. You may use the following link: https://cert.ccsemc.com/filing/