



- 1) It appears that information regarding both the TX and RX have been provided (i.e. a block diagram for each, external photos for each, etc.). Please note that for the FCC, only the TX may be covered by this application. It does appear that you wish to Certify them as a pair for IC. Please note that by using the same model number on both the TX and RX, IC states:

We do allow that a TX and a RX which are working as a system be submitted together, certified under the same certification number AND under one unique model number (for both TX and RX) only if the company can assure IC that the TX and RX will only be sold together as a system. The best example are cordless telephone: both handset and base are certified under one certification number and one model number (and even sometimes the base and handset do not transmit on the same frequency) because it is considered as ONE product and sold as a package.

However the users manual clearly shows that multiple receivers can be used with a single TX. Therefore it appears that additional RX's may be purchased/sold separately. If this is the case, then the RX should actually be Certified under a separate model number (but can be the same Certification Number. Please review the attached email for further information. It appears that item 2) would apply here. Please explain how we should handle the RX portion of this system given the information here.

The client has declared that they would sell TX and RX together.

The declaration has been uploaded to website.

- 2) This is a portable device. Under ANSI C63.4, portable devices must be positioned in each of 3 axes during testing in effort to obtain worse case results. Test report does not appear to support if this was done. Please correct.

The following information has been added in the test report: "The EUT rotated through three orthogonal axes to determine which attitude and equipment arrangement produces the highest emission relative to the limit was used in making final radiated emission measurements. Pre-test was performed at 3 orthogonal axes, compliance test in X axes as per photograph in section 6 of this report". Please refer to P9 of the test report for details.

- 3) Review of this device shows that the device contains pulsed emissions and therefore average emissions should only be determined by taking the peak reading and subtracting a correction factor for the average duty factor over a worse case 100 msec. Please correct.

The average emissions was determined by taking the peak reading and subtracting a correction factor for the average duty factor over a worse case 100 msec. Please refer to P7, P8, P9, P10 of the test report for details.

- 5) Reviewing the part for the encoder, it appears the output for this device is pulsed and not FSK. Therefore emissions designator such as L1D would be applicable. Please review and correct the emissions designator for the IC form.

The modulation method of this device is ASK as applicant declaration and the emission designator for IC form is corrected.

- 6) FYI....All spurious emissions are not necessarily 75.6 dBuV/m. Any frequencies falling into a restricted band would be 74.0 dBuV/m peak, 54.0 dBuV/m avg.

The limits for any frequencies falling into a restricted band have been changed to 74.0 dBuV/m peak, 54.0 dBuV/m avg. Please refer to P10 of the test report for details.

**7) FYI....731 form for 15.231 devices should be DSC not DXX.**

[Change DXX to DSC. Please refer to the 731 form.](#)

**8) FYI....Kindly use our most recent IC form. Several revisions to this document have occurred.**

[The update IC form has been uploaded to website.](#)