

## Response to May 13, 2009 RT

Company:	Coencorp (MFлом)	Composite Device:	Yes:	No:
MT#:	81602	FCC Direct Filing:	Yes:	No:
		Permit But Ask:	Yes:	No:
FCC ID:	VY3-DUL5NA	FCC Rule Part:	15.249	
UPN:	7552A-VDUL5NA	RSS Standard:	RSS-210	
FRN:		Class II PC/Reassessment:	Yes:	No:

May 13, 2009

### Technical Review:

1. The FRN stated on form 731 is not of the applicant. [This error has been corrected and a new application accompanies this response.](#)
2. Need internal pictures of VDU; need to see the form factors. [Internal photos of the VDU are included with this response.](#)
3. For LMA the module must be tested as a stand-alone. It appears that this was not the case. [The test data for stand-alone configuration has been added to both test reports.](#)
4. The test report for the 15.249 VDU describes the antenna as being permanently attached. But the external pictures suggest otherwise. Please clarify this discrepancy. [The test reports have been corrected.](#)
5. It appears that radiated spurious emissions were only performed on the VDU. Please perform spurious emissions on the DC unit or provide justification why it was not performed. [This test data has been added to the 15.249 test report.](#)
6. It appears antenna data sheets have not been provided. [Antenna data sheets are attached to this response.](#)
7. Please explain why 15.207 were performed in the 15.207-15.209 report and not in the 15.249 report even though they seem to be same VDU unit. [Rule section 15.249 does not call out testing to 15.207.](#)
8. The pdf document titled "User Guide\_VDU" has a typo on page 5. The warning text should state 15.249 rather than 15.247. [There are actually two user guides and they both have the typo. Both manuals have been corrected and are attached to this response.](#)
9. Please explain why the labels contain the FCC logo? [Revised labels have been remitted.](#)
10. What frequency and voltage was CEV performed to in the 15.209\_209 test report? [This data has been added to the test report.](#)
11. There does not appear to be CEV average data. Please include this data in the test report. [Only Quasi Peak data was provided as the average measurements were all greater than -20 dB below the limit and a statement to that effect has been added to the test report. Only the 6 highest measurements are listed.](#)
12. Please show how the limits, correction factor and corrected values were derived for the 15.209 data on page 6 of the 15.207\_209 test report. [A description of this is now in the test report.](#)
13. The test procedures states that the receiving antenna was placed 3m away from the EUT for making the 15.209 measurements in the 15.207\_15.209 test report. But the test photos show that it is a lot closer. Please explain this discrepancy. [This is a typo as the 125 KHz for 15.209 were performed at 1m with an active loop antenna. The report has been edited to indicate the 1m distance.](#)

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IC RT:

1. There should be two Appendix B sheets for the two radios since this will make it much more intuitive (i.e. 900 MHz and 125 kHz radios). [The original Appendix B sheet has been separated and two individual Appendix B sheets are being remitted with this RT response.](#)
2. Please clarify where the worst case receiver spurs were taken from.
3. The 99% bandwidth of the 125 kHz radio does not appear to have been measured. [This test data has been added to the test report.](#)

Admin Review By: Jennifer Sanchez

Technical Review By: Dusmantha  
Tennakoon