

## **Nemko North America TCB response to FCC's inquiry**

### **1. Why was this device granted to begin with?**

The original application and its exhibits such as technical description, operational description and test report all clearly stated that the operational frequency is 915 MHz ISM Band only (which is for North American use). There was no indication within the form or operational description exhibits that other frequencies are supported.

The User Manual indicated that for Europe the frequency for NIB is 864 MHz, though we believed that the operation would be capable in EU and not US. We understood that operation at 800 MHz would not be possible in the US under this rule part, and we were not aware that the end user had the capability to tune to other frequencies. The original manual did include an instruction as follows "Choose the NIB frequency, 864 MHz (EU) or 915 MHz (NA, ANZ). Press [+] to select, and press and hold [+] to confirm your selection.", however as this was in a separate following paragraph we did not see the additional capability and therefore did not raise the question to the applicant.

### **2. What processes are in place to make sure this does not happen again?**

In future filings, we will review the user manual thoroughly for such information, using key word checks especially in relation to operating frequencies and determine if any further capabilities are described. If any non-US or non-permitted capabilities are described these will be raised with the applicant for resolution.

Internal Training was performed on November 24th, for the whole Nemko TCB group in relation to review guidance of user manuals for country certifications. Topics included in the review of manuals included consideration of aspects relating to intended environment, installation, radio frequency capability, user configurable settings, or non-approved accessories for example. This training is recorded in our Training records at Nemko and formed part of our TCB Exchange training.

### **3. Also, why are there several newly uploaded documents in several exhibit types? For example, why is there a cover letter in the External photos exhibit?**

While uploading the exhibits, we made an inadvertent mistake by choosing the wrong exhibit type for certain exhibits. The wrong exhibit has been superseded and the cover letter has been re-uploaded.