

1. Please clarify whether you would like the schematics to be held permanently confidential, temporarily confidential or non-confidential. Even if an exhibit is marked non-confidential, by default all information is not accessible by the public before the application is approved. After the grant is issued, all non-confidential information would be viewable by the public. The schematics file should have been marked as confidential when submitted since you requested so in the confidentiality request letter. I will mark the file permanently confidential per your 5/21 request. If this is not your intention, please let me know.

The intention is to keep the schematics confidential.

2. Application Form 731, User's Manual, and test report all refer to the EUT device as UWB (Ultra Wide Band). However, the EUT is actually applying for equipment authorization under Part 15C, and in particular 15.250, as a Wideband Transmitter with the equipment type of WBT, not UWB (Part 15, Subpart F). Please remove reference to UWB to avoid misleading consumers.

Once the Form 731 has been submitted, I cannot return to it to make corrections. When I filed, I realized my mistake and tried to correct to WBT instead of UWB. The system locked up, but I thought the change was made successfully. Would you kindly make the change from your end? Or if you can put the application in a mode where I can modify the Form 731, I will be glad to handle that myself.

3. User's Manual should include information to user specified in Part 15.21 (mandatory) and 15.105 (if applicable).

Please find attached the revised draft manual. The Part 15.21 and Part 15.105 information can be found on page 2

4. Please include in the operational description the following information important for the reviewer to assess the EUT's RF characteristics and test data:
 - a. source data rate;
 - b. all intermediate frequencies used in up-converting 1 MHz pulse train to the carrier frequency (block diagram should include such information as well);
 - c. describe any channel coding, frequency hopping, pulse shaping, spectrum spreading, channel step, number of channels, if applicable;
 - d. antenna gain and antenna pattern;
 - e. since there is a programming interface, please describe what can be programmed and how.

This information has been provided in the updated User Manual and operational description.

5. Frequency stability test should have been included in the test report per 15.250(a), over the advertised temperature range in the user's manual (-4 - 131 degree F) as well as battery voltage fluctuation as specified in 2.1055.

This information has been provided in the updated User Manual and operational description.

6. Since 15.250 rules on radiated emission and peak power are all specified in power, please present raw field strength measurement data as well power level data in Sections 4-7.

Sections 4 and 5 have been updated to show the data in power. Please note that Section 6 already had the emissions levels reported as power. Please note that Section 7 does not specify limits as power, so there is no need to report values in this section as power.

7. The test setup photos show that tests were conducted in an anechoic chamber. However, strong background WiFi signals can be seen on several of the spectrum plots. Please explain.

Please note that this is not a strong WiFi signal. It is roughly 40 dB **below** the FCC Class B limit at 1 meter. It is also more than 15 dB below the UWB limit. The source for this emission was a cable that was penetrating the absorber lined shielded enclosure. Due to the length of time it takes to re-measure these tests and the very large margin of the peak ambient signal to the RMS noise floor, it was deemed unnecessary to retest with the offending cable removed. Also, there is only a requirement that ambient noise levels be more than 6 dB below the limit, which is demonstrated in these plots.