Compliance Testing, LLC

FCC ID: 2ABS2-SOSR1
IC ID: 11740A-SOSR1
CT Project: P13c0009

From: Chris Harvey
Date: 3/26/14

1. The revised FCC Confidentiality now has Short-term confidentiality request for Block Diagram, External Photos, Internal Photos and Operational Description exhibits (the original did not request Short Term Confidentiality at all). You should ensure that all the other non-confidential exhibits do not also contain images of this device because those exhibits will be publically viewable. Also, the revised letter requests 365 days of STC, but the FCC has a maximum of 180 days allowed for STC. Please provide a corrected FCC Confidentiality Request Letter.

SWG – Please refer to updated cover letters.

2. You have now also provided a separate IC Confidentiality request letter, but it seems to be a copy of the FCC letter (please note that my request clearly stated that the requirements are different). IC does not have a Short Term Confidentiality policy or capability, so the letter is inappropriate for IC filing. Please provide a corrected IC Confidentiality Request letter for the IC requirements.
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SWG – Please refer to updated cover letters.

3. The External photos show only one external side of a device, please provide photos showing all of this device.

SWG – Please refer to updated external photos.

4. The internal photos and label photo seems to only show a portion of the device that appears in the External Photos. Does this device [transmitter] separate into 2 halves?

SWG – Yes, please see updated internal photos.

5. Are the Electronics only contained inside one 'half'?

SWG – Please refer to updated photos exhibit.

6. The User's Manual exhibit should include the required compliance information required by FCC 15.19 and 15.21 as well as the RSS-GEN section 7.1.3 in English and French. Please review the exhibit provided and indicate how this complies with FCC 15.19 and FCC 15.21 and RSS-GEN 7.1.3 in English and French.

SWG – Please refer to updated User Manual exhibits.

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7. The theory of operation which seems to describe operation not allowed in 15.231:

While the chest clip is buckled, the SOS transmitter communicates buckled state information once every 30 seconds to the SOS receiver. It does so using a brief burst of 8 separate yet identical transmissions at 434 MHz frequency, each transmission of 14 bytes length, consisting of a 5 byte preamble, a globally unique 4 byte transmitter ID, a 1 byte information field containing the buckled state of the chest clip….This describes transmission at a set interval which is not allowed in 15.231.

SWG – Please refer to updated theory of operation exhibit.

Response by: SWG & CTL

Submitted by: CTL

Date: 4/3/14