

## Response to Inquiry to FCC (Tracking Number 627742)

**oetech@fcc.gov**

发给 黎建快

2020-10-20 20:10 隐藏信息

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### **Inquiry on 10/10/2020 :**

#### **Inquiry:**

Dear

Sir,

I am from Shenzhen STS Test Services Co., Ltd. we completed a test of anportable UWB device, and use section 15.517 for evaluation, Please help to confirm that the test report meets the FCC requirements.

And,

Apply for FCC ID: 2AW7W-631

### **FCC response on 10/15/2020**

There appears to be two specific issues. The first is that you mention the device is going to certified under rule part 15.517 while the test report indicates that it is to certified under rule part 15.519. What rule part is this device to be certified. Rule part 15.519 has lower radiated emission requirement.

§15.517 Technical requirements for indoor UWB systems.

(c) The radiated emissions at or below 960 MHz from a device operating under the provisions of this section shall not exceed the emission levels in §15.209. The radiated emissions above 960 MHz from a device operating under the provisions of this section shall not exceed the following average limits when measured using a resolution bandwidth of 1 MHz:

| Frequency in MHz | EIRP in dBm |
|------------------|-------------|
| 960-1610         | -75.3       |
| 1610-1990        | -53.3       |
| 1990-3100        | -51.3       |

|             |       |
|-------------|-------|
|             |       |
| 3100-10600  | -41.3 |
| Above 10600 | -51.3 |

(d) In addition to the radiated emission limits specified in the table in paragraph (c) of this section, UWB transmitters operating under the provisions of this section shall not exceed the following average limits when measured using a resolution bandwidth of no less than 1 kHz:

| Frequency in MHz | EIRP in dBm |
|------------------|-------------|
| 1164-1240        | -85.3       |
| 1559-1610        | -85.3       |

§15.519 Technical requirements for hand held UWB systems.

(c) The radiated emissions at or below 960 MHz from a device operating under the provisions of this section shall not exceed the emission levels in §15.209. The radiated emissions above 960 MHz from a device operating under the provisions of this section shall not exceed the following average limits when measured using a resolution bandwidth of 1 MHz:

| Frequency in MHz | EIRP in dBm |
|------------------|-------------|
| 960-1610         | -75.3       |
| 1610-1990        | -63.3       |
| 1990-3100        | -61.3       |
| 3100-10600       | -41.3       |
| Above 10600      | -61.3       |

(d) In addition to the radiated emission limits specified in the table in paragraph (c) of this section, UWB transmitters operating under the provisions of this section shall not exceed the following average limits when measured using a resolution bandwidth of no less than 1 kHz:

| Frequency in MHz | EIRP in dBm |
|------------------|-------------|
| 1164-1240        | -85.3       |
| 1559-1610        | -85.3       |

Secondly,

In rule part 15.519 the requirement is (1) A UWB device operating under the provisions of this section shall transmit only when it is sending information to an associated receiver. The UWB intentional radiator shall cease transmission within 10 seconds unless it receives an acknowledgement from the associated receiver that its transmission is being received. An acknowledgment of reception must

continue to be received by the UWB intentional radiator at least every 10 seconds or the UWB device must cease transmitting.

The 10 second shut off requirement shown in the graph does not show it properly if the device is to be certified under rule part 15.519.

Also, An acknowledgement of reception must continue to be received by the UWB device at least once every 10 seconds, or else the device shall cease transmission of any information other than periodic signals for use in the establishment or re-establishment of a communications link with an associated receiver.

**The FCC wants to see the re establishment periodic signals to establish re establishment of a communication link and the radiated emission to see if it is within limits and the period of the signal.**

---Reply from Customer on 10/16/2020---

Dear Sir,

The FCC wants to see the re establishment periodic signals to establish re establishment of a communication link and the radiated emission to see if it is within limits and the period of the signal.

STS Reply:

1. EUT is a portable product. The report USESRule Part 15.519 for testing and does not use Rule Part 15.517 for evaluation. Please help me confirm it.
2. The test report Page 46 and 47 test data has been updated.

### **FCC response on 10/16/2020**

So, you contacted the grantee and you established the fact that it is a part 15.519 device. The graph on page 47 is fine but the FCC does not know the time frame between the receiver shut off and the response of the transmitter shut off. The transmitter must shut off within 10 seconds. The graph is not clear that it is within the 10 second requirement.

§15.519 Technical requirements for hand held UWB systems.

(1) A UWB device operating under the provisions of this section shall transmit only when it is sending information to an associated receiver. The UWB intentional radiator shall cease transmission within 10 seconds unless it receives

an acknowledgement from the associated receiver that its transmission is being received. An acknowledgment of reception must continue to be received by the UWB intentional radiator at least every 10 seconds or the UWB device must cease transmitting.

---Reply from Customer on 10/19/2020---

Dear Sir,

UWB test report Page47 has been added Notes, please help me check again.

**FCC response on 10/20/2020**

The PAG item has been reviewed and it appears to be compliant. The TCB can review all non PAG material for compliance.

**Attachment Details:**

[UWB Test Report Rv01](#)

[UWB Test Report Rv02](#)

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