From: Claire Hoque, claire.hoque@ul.com

To: Jyun-Cheng Chen, JC.Chen@fcc.gov

Re: FCC ID: A3LCYWDCB7UT

Applicant: Samsung Electronics Co Ltd

Correspondence Reference Number: 42032

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1. Revised Specification (Page 12, user's manual) seems to indicate that the installation CD allows band group (BG) selection and yet the country code is set at the factory. This is a somewhat contradictory statement. If the device's country code is fixed, then users would find BG selection allowed in the installation software does not take effect. On the other hand, if the CD is also country code fixed at the factory, then many different SKUs of EUT and CD ROM would have to be produced. The latter is not very practical since CD ROMs are usually pre-burned, not per order, in a much larger quantity. An explanatory attestation from the applicant on country code selection is requested.

<answer> pls see revised User Manual and revised Theory of Operation.

2. In your 6/8 clarification to the emission at 1593/18896 MHz, you state that there is digital circuitry unrelated to the UWB operation and that test mode software is able to disable the UWB without disabling the digital circuitry. However, we cannot find such circuitry after studying the operational description, block diagram and schematics; nor does a JBP/JBC filing exist for an unintentional radiator. Please clarify.

<answer> Referring to the revised Theory of Operation, there is no digital circuitry unrelated to the UWB operation, thus there is no associated digital device as defined by 15.3(k). Referring to the Test Report, all digital circuitry emissions meet the limits specified in 15.209 as referenced by 15.521(b), which does not require either a JBP/JBC filing or a DoC.

Pls see revised Theory of Operation clarifying test mode software control.

3. 15.519(b) (15.521 was a typo) requires that "a device operating under the provisions of this section must be contained between 3100 MHz and 10,600 MHz." Additionally, 15.521(e) states

that the highest radiated emission f_M must be contained within the UWB bandwidth. Indeed, 2.1046 through 2.1057 measurement procedures are not required for Part 15 and Part 18 equipment. However, they have been commonly used when specific measurement procedures are missing in Parts 15 and 18. The applicant and test lab are free to choose other sound engineering practice to demonstrate compliance. On the other hand, if FCC has explicitly agreed to (not due to overlook or not processed by FCC) to test exemption in the past, please provide an example.

<answer> pls see FCC ID: U9YAL5625 for precedent reviewed and Granted by the FCC.

4. With regard to demonstration of compliance with 15.519(a)(1), since transmission and timing are software controlled by the Alereon AL6301 processor, putting compliance statement in the user's manual would be confusing to users because they have no control at such. The referenced KDB 393764 is a general document, applicable to various types of UWB devices with various requirements; it does not claim to provide an exhausted list of required items. In fact, Paragraph 8 states that "At the minimum, the following information is required for processing a UWB application..." The applicant and test lab are free to choose a sound engineering practice to demonstrate compliance of the 10 second stop transmission time. If FCC has explicitly agreed to test exemption in the past, please provide an example.

<answer> pls see revised Theory of Operation regarding the 10 second stop transmission time.

See FCC ID: U9YAL5625 for precedent reviewed and Granted by the FCC.

5. Please clarify whether the 6/8 reply was from the applicant or the test lab. For statements of attestative nature, only those from the applicant can be presented since applicant is the responsible party, not the agent.

<answer> The 6/8 reply #3 was based on statements from the Applicant. Also see revised Theory of Operation.

The 6/8 reply #5 was based on the Theory of Operation.

The 6/8 reply #7 regarding digital circuitry was from the test lab. For clarification see above reply to Q#2 and revised Theory of Operation.

The 6/8 reply #7 regarding test mode software was based on statements from the Applicant. Also see revised Theory of Operation.

Thanks,

UL CCS