Chris Harvey

From: emctest@emc-kashima.co.jp

Sent: Wednesday, May 30, 2007 12:35 AM

To: charvey-tcb@ccsemc.com

Subject: Re: Victor Company of Japan Ltd, FCC ID: ASIK4V003, Assessment NO.: AN07T6831,

Notice#1

Attachments: ASIK4V003 Label and Location 2.pdf; ASIK4V003 Request for LMA 2.pdf





ASIK4V003 Label ASIK4V003 Request and Location 2... for LMA 2.pd...

Dear Mr. Harvey,

Thank you for your e-mail regarding TCB Application. I answer as follows.

- 1. Please provide the return frequency of the passive tag? This frequency must be within the allowed band of FCC 15.225.
- ----The tag uses the same frequency as the RFID Unit.
- 2. The compliance information from FCC 15.19 must be located on the device since this device is sufficiently large to allow the labeling (even though the information has been contained in the manual).
- ----Please see the attached revised file of the Label and Location.
- 3. The module does not contain shielding as required by the FCC Modular approval procedure. A Limited Modular Approval may be issued if it can be shown that compliance is ensured in each configuration. The FCC has required shielding of modules to ensure that there is no unintended coupling to/from the circuits of the EUT or host. The FCC has recently clarified this position in FCC 07-56, new Rule section 15.212: Please update your Modular Approval cover letter to indicate how the shielding requirement is met.
- ----Please see the attached revised file of the Request for LMA.
- 4. The labeling requirements for modules is that the module be labeled and a separate label on the outside of the host to indicate that the module is, referencing the FCC ID of the host installed (example: "This Device Contains FCC ID: xxxx). Please update the labeling exhibit to show the EUT label on the module and the host label example for this product.

----Please see the attached revised file of the Label and Location.

Best regards,

charvey-tcb@ccsemc.com wrote:

- > Dear Kenichi Suda-san
- > You are listed as the technical contact for the above referenced TCB Application., The following items need to be addressed before the review can be continued:
- > 1. Please provide the return frequency of the passive tag? This frequency must be within the allowed band of FCC 15.225.
- > 2. The compliance information from FCC 15.19 must be located on the device since this device is sufficiently large to allow the labeling (even though the information has been contained in the manual).
- > 3. The module does not contain shielding as required by the FCC Modular approval

procedure. A Limited Modular Approval may be issued if it can be shown that compliance is ensured in each configuration. The FCC has required shielding of modules to ensure that there is no unintended coupling to/from the circuits of the EUT or host. The FCC has recently clarified this position in FCC 07-56, new Rule section 15.212:

> New 15.212 (b) A limited modular approval may be granted for single or split modular transmitters that do not comply with all of the above requirements, e.g., shielding, minimum signaling amplitude, buffered modulation/data inputs, or power supply regulation, if the manufacturer can demonstrate by alternative means in the application for equipment authorization that the modular transmitter meets all the applicable Part 15 requirements under the operating conditions in which the transmitter will be used. Limited modular approval also may be granted in those instances where compliance with RF exposure rules is demonstrated only for particular product configurations. The applicant for certification must state how control of the end product into which the module will be installed will be maintained such that full compliance of the end product is always ensured.

> Please update your Modular Approval cover letter to indicate how the shielding requirement is met.

> 4. The labeling requirements for modules is that the module be labeled and a separate label on the outside of the host to indicate that the module is, referencing the FCC ID of the host installed (example: "This Device Contains FCC ID: xxxx). Please update the labeling exhibit to show the EUT label on the module and the host label example for this product.

> The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee. Also, please note that partial responses increase processing time and should not be submitted. Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.

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