Non-Conformities FCC ID: C3K1073 (Ref # E07-000004-1)

The items listed below represent requests for information following review of this application. Further question may arise pending review of responses to these items.

1 For the temporary confidentiality request, please indicate the prospective target date for release of temporary confidentiality.

## Response: February 9, 2007.

2 Please provide clocks and frequencies used on the block diagram in accordance with 2.1033(b)(5).

## Response: A revised block diagram has been uploaded

3 Test setup photos indicate testing performed over wooden table. Please verify that radiated emissions are not increased due to proximity to RF absorbing material.

## Response: A revised test report has been uploaded.

4 Please clarify statement in test report on top of page 6 regarding compliance with 15.31(e). Compliance testing should be performed with a fresh battery.

# **Response:** All compliance testing was performed with new batteries installed in the EUT.

5 Page 15 of the test report indicates operation on 915MHz. Please clarify if this is a typo or actual equipment operation.

## Response: A revised test report has been uploaded correcting this error.

6 The RF output power measurements were not measured in accordance with DA00-705. The test report equipment list indicates use of an RF power meter. 15.247(b) requires measurement of peak power. Re-measure peak output power in accordance with proper test procedures and update documentation as necessary.

## Response: A revised test report has been uploaded correcting this error.

7 Band Edge Plots provided on page 27 and 28 do not indicate whether they are conducted or radiated. Please clarify test setup for these plots.

Response: A revised test report has been uploaded correcting this error.

8 The frequency range of investigation listed for the report is inadequate. In accordance with 15.33, frequency range of investigation must extend to at least the 10th harmonic of the highest clock or frequency used within the equipment. Please explain why test data indicates highest frequency of investigation is 13GHz.

## Response: A revised test report has been uploaded.

9 The test report declares that testing to 15.207 was not performed since the equipment is battery operated. However, the users manual and Page 3 of the label location information indicates operating configurations with rechargeable batteries and a charging base. Please elaborate on this operating configuration; specifically, if the device can operate while charging, testing to 15.207 is required. Please update provided documentation as necessary.

Response: An updated user's manual has been uploaded. Also, the EUT can use rechargeable batteries but they must be removed in order to be charged.

10 Please provide information satisfying 15.247(h), "The coordination of FHSS systems in any other manner for the express purpose of avoiding the simultaneous occupancy of individual hopping frequencies by multiple transmitters is not permitted"

## **Response: The keyboard is Bluetooth 2.0 compliant**

11 MPE calculations are provided to satisfy RF Exposure concerns, however the equipment may have operating configurations closer than 20cm. In this case, MPE calculations do not suffice. Typically, devices of output power below the lower threshold do not require RF exposure evaluation.

## **Response: Revised MPE calculations have been uploaded.**

Non-Conformities IC: 3048A-1073 (Ref # E07-000004-1 IC)

In addition to the items listed from the FCC review, please address the following:

The items listed below represent requests for information following review of this application. Further question may arise pending review of responses to these items. 1 The application form indicates manufacturer is Microsoft, however the test report indicates a different manufacturer. Please clarify the actual manufacturer and update documentation as necessary.

## Response: A revised test report has been uploaded which shows Microsoft as the manufacturer.

2 General Note: Receiver compliance testing is typically not performed to transmitter specifications (eg 15.209). Receiver specifications should be used for page 8 of test report (eg 15.109). Please ensure proper test specifications are included in the report.

Response: Customer requested receiver testing under 15.247(d). 15.247(d) also takes into consideration the restricted band and calls out 15.209 as the limit. For this equipment under test the 15.209 limit is stricter than the 15.247(d) limit and I believe that is why it was used since it also takes into consideration the restricted band.

3 The company number for the applicant information is not filled out correctly.

Response: A revised application form has been uploaded.