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ATCB
Attn.: Mr. Timothy R. Johnson
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Subject
Comments

Date
December 02, 2008.

Our reference
17_CGDTRANSE_comments-
and-answers

Your reference
ATCB006951

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Our General Terms and
Conditions, as filed at the
Chamber of Commerce in
Groningen, are applicable to all
orders given to TÜV Rheinland
EPS B.V.

TÜV Rheinland EPS B.V. is
registered at the Chamber of
Commerce in Groningen with
no. 27247331.

Dear Mr. Johnson,

Related to your comments based on our request for certification for the
following product,

FCC ID : CGDTRANSE
Brand : Nedap
Model : TRANSIT EDGE
Description : A field disturbance sensor operating on 2,4 GHz.

we would like to provide you with the following information:

Question 1:

The block diagram appears to be a system block diagram. However the FCC expects the block diagram should show the frequencies of all oscillators in the TX portion of the device being Certified (CFR 2.1033(a)(5)). Ideally this block diagram would be the detailed level for the part 7815123 shown on the current block diagram. Please update the list of confidential exhibits if necessary.

Answer 1:

The block diagram has been modified and the frequencies of all oscillators have been incorporated. The documents has been attached as:
"07_CGDTRANSE_Block-Diagram_MODIFIED.pdf".

Question 2:

Complete photographs of the top/bottom of all boards does not appear to be provided. For instance, a) photographs of the board(s) located in the "top cover"/antenna area (7815123), and b) There does appear to maybe be a missing board (7800150) from the photographs. Please provide.

Answer2:

We have updated the photo report of the interior photographs with the coupling unit for the antenna of the 2.4 GHz part. Photo's of all other boards are displayed including the photo's of the Tx to be certified.
(see 09_CGDTRANSE_Internal-Photographs_MODIFIED.pdf)

Question 3:

Ideally the Model number Certified should match the format on the label. It appears on the label in all capital letters, while the form/test reports provided shows another format. Please review and correct for consistency.

Answer 3:

The model number has been corrected (all capitals) in all documents. The documents have been attached (CGD# 01, 02, 05, 07, 09, 13, 15 and 1444A# 03, 04).

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Question 4:

For IC, an RSS-102 Annex should be provided and signed regarding RF exposure information. See current cover levels for forms if necessary.

Answer 4:

The attestation has been added, see 20_CGDTRANSE_IC_Attestation.pdf, also a Annex A is added.

Question 5:

Please note that REL listings themselves may be delayed by IC. IC is requesting that a Canadian Representative letter be provided to help ensure timely REL listing for the future – although this letter is currently voluntary and not required. This letter is simply an acknowledgement by the Canadian Rep that they understand their responsibility. (See RSP-100 section 3.4 for responsibilities).

Answer 5:

We have taken good notice of this requirement and will forward appropriate documents in the future.

Question 6:

Users manual appears to be missing basic 15.105 information.

Answer 6:

According to us, this information should be printed for a Class B digital device. Since the basic TRANSIT EDGE is also an intentional radiator (class C equipment) it seems to us not correct. However we have incorporated the text in the user manual as requested (see 15_CGDTRANSE_User_Manual_mod.pdf).

Question 7:

This device is asking for Certification under 15.245. 15.245 is for field disturbance sensors, but this device appears to be an RF ID device. According to the FCC, the primary function cannot be data transmission but may be allowed as an ancillary function. Additionally, Data transfer is possible only with FDS systems using passive tags and only if the data transfer function is ancillary to the primary purpose of a FDS system which is the detection of the presence of people or objects. Please explain.

Answer 7:

This device is a field disturbance sensor. This has been discussed when the first basic model with FCC ID: CGD-TRANSIT was filed. The tag is influencing the field (as intended by field disturbance sensing) but the tag has the capability of influencing the field with a particular on-off pattern. The field disturbances are detected and the on-off disturbances represents a particular address. No data is transmitted by the 2.4 GHz Tx of the TRANSIT EDGE.

Question 8:

AC powerline emissions appear to show a strip outlet attached. Has this strip been verified to not contain any filtering components? Generally the FCC desires the device be directly plugged into the LISN.

Answer 8:

No filtering is included in the strip outlet. The LISN is not capable of handling standard main plugs. The connection to the LISN is made by using this strip outlet. The calibration has also been performed using this connection. The Connector of the LISN may be considered as being the strip outlet.

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Question 9:

Limits at 4.8768 GHz, 7.3152 GHz, 12.192 GHz, 4.896 GHz, 7.344 GHz, 12.240 GHz, 4.914 GHz, 7.371 GHz, 12,284 GHz should be 54 dBuV/m AVG/ 74 dBuV/m PK (15.209 limits for Restricted Bands).

Answer 9:

The test reports have been modified. The limits on mentioned frequencies have been updated. The tables containing these values have been modified (see 13_CGDTRANSE_Test_report_Part15C_MODIFIED.pdf) and 04_1444A-TRANSE_Test_report_RSS_amd.pdf.)

Best regards,
TÜV Rheinland EPS B.V.



P. de Beer
Approvals & Quality Manager