

July 7, 2003

RE: OPTEX CO., LTD.
FCC ID: DC9EZ-SERIES

This is reply to your comment on June 6, 2003.

1.) Please insert RF Exposure warning under you FCC heading. To read something like:
A1. We've already answered this comment on 7/1/2003.

2.) Please correct analyzer plots as they have the wrong resolution bandwidth. RBW cannot be less than 1MHz and VBW must be equal to or greater for all readings over 1 GHz.
A2. Output signal of this transmitter is non-modulation and it is also continuous wave (CW). At this testing, signal level and the spurious is fairly low. Therefore, at signal level testing, we confirmed that there is no change of peak level at RBW=1MHz and VBW=100kHz (VBW is normally higher than RBW, we set VBW=RBW at testing). For reducing the noise floor, RBW and VBW have to be equal to 100kHz. Because if RBW=VBW=1MHz, it is very difficult to measure accurate value with existing measuring instruments. Please see attached "revised test report. pdf".

3.) CFR Pt. 15.207 Power Line Conducted test on EUT is missing from report.
A3. Please refer to additional Test Report "23BE0059-HO-1(FCC15C). pdf".

4.) Please submit Schematics that show component values.
A4. Please refer to attached "Parts list. xls".

5.) Please submit Occupied Bandwidth plots.
A5. Please refer to additional Test Report "23BE0059-HO-1(FCC15C). pdf".

6.) Please confirm radiated tests were performed on three orthogonal planes?
A6. As you can see in attached "revised test report. pdf" of section 2.5.2, EUT was checked with 3 directions and it is understandable that measurement was performed with the maximum direction.

7.) CFR PT. 15.31(1) states when performing measurements at a distance other than that specified, the results shall be extrapolated to the specified distance using an extrapolation factor of 20 dB/decade (inverse linear-distance for field strength measurements; inverse-linear-distance-squared for power density measurements). Your report does not show if the distance correction factors on the plots relates to this requirement or not. Please confirm if this is the extrapolation to 3 meters as called for.

A7. At this frequency band, it is almost impossible to measure the accurate value at the distance of 3m. By the tested wavelength, we can assume distance of 25cm as Far Field. This Distance Conversion is shown at section 2.4.1 and 2.4.2 of the "revised test report. pdf". We followed FCC15.31(f)(1) and used 20dB/ decade.

