

Non-Conformities FCC ID: EO9100GR (CKC CS Ref # E08-000025-FCC-01)

The items listed below represent requests for information following review of this application for certification under United States (FCC) regulations. Further question may arise pending review of responses to these items.

O K	#	Non-Conformity or Comment	Submitted Response	Respondent / Date of Response
X	1	The block diagram indicates that the channel usage policy is dependent on the serial number of the equipment. Please clarify how this satisfies the channel usage policy required in 15.247(a), “The system shall hop to channel frequencies that are selected at the system hopping rate from a pseudo randomly ordered list of hopping frequencies. Each frequency must be used equally on the average by each transmitter. The system receivers shall have input bandwidths that match the hopping channel bandwidths of their corresponding transmitters and shall shift frequencies in synchronization with the transmitted signals.” Specifically, please update the operational description to include more detail with this regard.	Updated operational description provided clarifies channel usage and hopping sequences.	Itron / 3/18/08
X	2	Please clarify compliance to 15.247(a)(i), “For frequency hopping systems operating in the 902-928 MHz band: if the 20 dB bandwidth of the hopping channel is less than 250 kHz, the system shall use at least 50 hopping frequencies...” Does the equipment operate on 50 channels in normal use (see also item 1)?	Yes, All units operate on 50 channels in normal use.	Itron / 3/18/08
X	3	The confidentiality request includes a reference to internal photos. The internal photos cannot be held confidential without further justification, such as that the unit is potted in final assembly and that any attempt to view the internal portions of the equipment would require destruction of the equipment.	Updated letter provided.	Itron / 3/18/08
X	4	If the unit is potted in final installation, please provide a photo	Additional photos provided.	Itron / 3/18/08

		showing equipment installed with potting material.		
X	5	Equipment calibration for Loop antenna is listed as DUE in the test report. Please clarify how this satisfies equipment requirements for properly calibrated test instrumentation.	Updated test report provided.	Itron / 3/18/08
X	6	Please clarify test data submitted in part 1 of test report (page 23); the spec limit applied to this data indicates compliance to 74dBuV/m level which is the “de-facto” peak limit for 15.209, however compliance with the average limit is also required. Please update test report to demonstrate compliance with 15.209 average limits.	Updated test report provided.	Itron / 3/18/08
x	7	<p>Please clarify how the equipment satisfies 15.247(g) and (h), “(g) Frequency hopping spread spectrum systems are not required to employ all available hopping channels during each transmission. However, the system, consisting of both the transmitter and the receiver, must be designed to comply with all of the regulations in this section should the transmitter be presented with a continuous data (or information) stream. In addition, a system employing short transmission bursts must comply with the definition of a frequency hopping system and must distribute its transmissions over the minimum number of hopping channels specified in this section.</p> <p>(h) The incorporation of intelligence within a frequency hopping spread spectrum system that permits the system to recognize other users within the spectrum band so that it individually and independently chooses and adapts its hopsets to avoid hopping on occupied channels is permitted. The coordination of frequency hopping systems in any other manner for the express purpose of avoiding the simultaneous occupancy of individual hopping frequencies by multiple transmitters is not permitted.”</p>	Updated operational description provided.	Itron / 3/18/08

x	8	Please clarify the frequency range of the equipment.	Equipment typically operates between 910 and 921.8, and for programming operates between 908-910 MHz. Therefore the majority of testing was performed between 910 and 921.8MHz. Insufficient information; see NC-2	Itron 3/24/08
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Non-Conformities FCC ID: EO9100GR (CKC CS Ref # E08-000025-FCC-02)

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O K	#	Non-Conformity or Comment	Submitted Response	Respondent / Date of Response
x	1	The device has been shown to be compliant within the frequency range of 910-921.8MHz. However in discussion with the client, the device is capable of operating at 908MHz during programming mode (once per device lifetime). Compliance for this operational mode is unclear at this time. See KDB Ref: 676926	Composite application filed as DXT with appropriate test report; also updated grant notes to include CC	Itron 4/4/08