American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

February 3, 2003
RE: AMCO Automated Systems
FCC ID: G8JVRT02 Application

1) The fundamental power appears to be miscalculated. The final value referenced in the paragraph and table should have been 62.9 from the numbers specified in the table. Since the reading is corrected by the duty cycle, then it should be compared to the average limit of 72.2 dBuV/m (Peak limit is 92.2 dBuV/m).

Response: The report has been modified to show the correct limit and corrected level.

2) The readings in section 3.3 for above 1 GHz take into account a duty cycle and should therefore be compared to the average limit of 52.2 dBuV/m or alternatively 54 dBuV/m according to 15.209 (Peak limit is 72.2 dBuV/m). Please note that the average measurements provided are not considered appropriate for pulsed emissions, therefore this portion of the data will be neglected.

Response: The report has been modified to show only the peak values.

3) The information provided appears to show that the TX operated over 1.5 MHz. Please explain if 15.31(m) should be applied. For example is this capable of being built or used on multiple channels, or is this strictly a tolerance.

Response: The unit transmits only at one channel, and has a frequency tolerance of +.0.5, -1.0 MHz, as shown in the Specifications in the User Manual.

4) The application is being submitted for a 15.231(e), 414.5 MHz TX. The operational description explains a Quasi-TX state that covers a new frequency range of 420-451 MHz. Therefore this device may actually contains a "composite" or multi-band transmitter. Please explain the whether the Quasi-TX state is actually considered as a transmitter or not. Please provide a detailed explanation.

Response: The device contains an Automatic Frequency Control (AFC) signal. These signals were considered as a spurious noise and were listed in the report. The AFC should not be considered as a second transmitter since there is no antenna connected at the end of the traces, but rather as a signal which is transmitted through traces and will radiate spurious noise. The duty cycle of the transmitter was used to correct the radiated measurement to compensate for the values by the "inherent" function of the unit.

Please contact ATCBINFO@rheintech.com with any questions. Thank you.