



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

November 27, 2007

RE: ATCB005657

FCC ID: IKQFMTD1 & IC: 6955A-FMTD1 for Scosche Industries Inc.

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

1. Measurements are to be made to the extent practical at the distance specified in the FCC Rules in accordance with Section 15.31(f) of these rules. Please provide justification for performing radiated emissions measurements at 10 meters instead of the 3 meter distance specified in Section 15.239 of the FCC Rules for an FM transmitter operating between 88 and 108 MHz. (For your information – These transmitters have had compliance problems and the FCC just removed them from a Permit But Ask procedure for TCB approval. This means that the FCC would review the application for such a device before the TCB would be allowed to issue a grant of Certification. I suspect that the FCC will not accept measurements at 10 meters for this type of device given the compliance problems that they have been experiencing. Once I receive your justification for making the measurements at 10 meters, I will ask the FCC if they will accept these measurements.)
2. Please confirm that radiated emission measurements were performed to the 10<sup>th</sup> harmonic on three channels located near the low, middle and high frequency range of operation for this transmitter. No test data is provided. Please also provide information on the relative noise levels at the 10 meter measurement distance so it can be determined that sufficient signal level is available to measure the harmonic emissions level limit at 10 meters.
3. Please identify the test procedure used to measure emissions from this transmitter. No test procedure was identified in the submitted test procedure.
4. Please confirm that the emissions from the EUT were maximized by placing it in various configurations such as rotated it through 3 orthogonal axes or varying the interconnecting cable positions.
5. Please confirm that the device was investigated to determine that it tuned only within the frequency band of 88.1 MHz to 107.9 MHz during laboratory testing and could not be adjusted to tune outside this band.
6. The block diagram shows that this device operates from 87 to 110 MHz. Both the FCC and IC do not permit operation outside the 88 to 108 MHz band. Please provide a new block diagram that shows compliance with these limits.
7. The test setup photos have two problems: (1) They do not show the EUT. Please provide another photo that shows the EUT being measured. and (2) The test setup does not follow ANSI C63.4 Sections 6.2.1 for use of a table top and Section 6.2.1.2 for arrangement of accessory equipment and their cables. Please justify why this was not followed.
8. Please confirm that the 200 KHz maximum bandwidth was measured with the volume of the MP3 player turned up to maximum or a level that maximized the emission bandwidth.

9. The operational description and the schematic both show that this transmitter operates with either only 8 channels or with all channels between 88.1 and 107.9 MHz (spaced 200 KHz apart). Either retest the device for 8 channel operation compliance or correct these incorrect exhibits.
10. Some of the plots provided between 30 and 1000 MHz appear to have no relation to the table data that follows each plot. For example, on page 12 the Mid Channel Vertical plot shows a peak emission level that is less than 30 dBuV/m but the table below it lists a corrected level of 36.4 dBuV/m and a recorded level of 52.4 dBuV/m. Both of these values are average values according to the note. Please explain the relationship of the plots to the tabular data that follows.
11. The contact person listed on the FCC Website for Scosche Industries is Peter Butcher. However, Jack DeBiasio has signed the FCC letters for confidentiality and agency. Either have Peter Butcher submit a letter authorizing Jack DeBiasio to sign these letters for Scosche Industries or change the contact name on the FCC Website to Jack DeBiasio. For help changing the contact name on the FCC Website, you can email Ms. Marianne Bosley at [Marianne@atcb.com](mailto:Marianne@atcb.com).
12. Please measure the 99 % bandwidth using the test procedure attached and submit the results in an amended test report. The bandwidth in the test report was not measured in accordance with IC accepted test procedures for measuring the required 99 % bandwidth.
13. Please submit an REL letter for the IC application. You can find a sample REL letter attached to the ATCB application for IC on our Website.
14. Please submit a letter requesting confidentiality of exhibits that are submitted to IC. All exhibits are uploaded to IC beginning in September of this year. A confidentiality request letter should be submitted to IC to protect Scosche Industries. A sample letter is attached to the ATCB application for IC on our Website.
15. Please provide an appendix A and B of RSS-102 in accordance with Section 5.1(e) of RSP-100 Issue 9 dated June 2007.
16. Please provide a new IC label that does not have the word "Number" between the letters "IC" and the colon (:) in the IC label. Section 5.2 of RSS-Gen Issue 2 dated June 2007 requires the label to be IC: followed by the company number and UPN number. The word "Number" must not be in the IC label.



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Examining Engineer

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application

termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.