

TCB Comment

The Operational Description lists the WiFi frequency range as 2412 – 2472 MHz, which includes channels 12 and 13, however, the DTS1 test report only includes data up to channel 11 (2462 MHz). Please clarify if the EUT is capable of operating on channels 12 and 13. Are these channels scanned? If so, is it passive or active scanning? Please note that if the EUT scans channels 12 and 13 in any way, then it must be capable of operation on these channels, and the appropriate test data must be provided. And, if it uses these channels at lower output levels to facilitate bandedge compliance, then the items specified in KDB Publication 594280)D01 must also be addressed. Please clarify.

NCEE Labs response:

It does not operate on channel 12 and 13 for North America. The firmware locks out these channels for models shipped to North America.

TCB Comment

Regarding the SAR test report: Page 6/33 of the IPSI Manual, with respect to RF Exposure, references the EUT's compliance "when used with Garmin authorized accessories", but the SAR report does not include any data taken with an accessory attached to the EUT. Please clarify what "Garmin authorized accessories" are being marketed with the EUT, and how it has been determined that their use results in continuing compliance with FCC and ISED RFX requirements, given the lack of test data to support this claim.

NCEE Labs response:

This is standard "boiler plate" type text. There are no additional accessories other than the charger, which cannot be used while the watch is being worn on the wrist because the charger port is on the back