

FCC ID: IPH-O4AHNH00
IC ID: 1792A-O4AHNH00
CT Project: P1410007

From: Chris Harvey
Date: 3/20/14

1. The photos show the receiver (dog collar) dog device unit, which is a separate device and not part of the Transmitter Certification application. It is noted that the Rx description includes mention of a 125kHz OOK modulated signal to control accessory units, which seems to be a device that would require its own separate approval. Please update the photos to not include the receiver units or clearly mark the photos to indicate that the receiver is an associated device not covered in this Certification. The exhibits that just document the receiver unit are being removed from this application and not being reviewed.

CT - Please refer to Rev1 exhibits.

2. It is noted that you have requested Short Term Confidentiality for the Internal and External photos, Test Setup photos and Manual, but the Label exhibit also contains a detailed drawing of this device, and it must be submitted and will remain non-confidential (available to the public). The label and Label location must be submitted but can use a more generic image of the device if you wish to show the location.

CT - Please note the label exhibits were for tech review purposes only, customer has provided separate label exhibits for uploading without photo of EUT.

3. The Label exhibit file names include '_for tech review only_do not upload', but the label exhibits for the Transmitter units must be uploaded to the FCC and IC.

CT - Please note this exhibit was for review purposes only. Customer has provided modified label exhibit for upload.

4. The label drawing for the Pro 550 shows 3 buttons (2 together and Tone button at top) and 2 switches, but the internal photos show location for 3 buttons together and one toggle switch. Additionally, the Schematic Diagram for the Pro Series HH has components for TONE, TOP, MID and BOT switches. It appears that the Internal Photos for the Pro 550 model are incorrect.

Garmin: Please refer to updated Internal photos exhibit.

5. The Operational Description describes the ISS Intensity Select Switch knob for the Pro 70, but does not describe the knob for the Pro 550. Please update the exhibit.

Garmin: Please refer to rev 1 exhibit.

6. The manual instructs user to connect this device to a computer through the USB port. Please confirm and then provide a declaration that this device is not a computer peripheral in accordance with current FCC policy about computer connections.

Garmin: Please refer to rev 1 exhibit.

7. The RSS-102 exhibit indicates a Duty Factor of 0.89%, but this is not justified.

Garmin: Please refer to Operational Description exhibit.

8. Please note that both Models Pro 550 and Pro 70 have the same 'model number' 04AHNH00, even though there are differences. Please note that Industry Canada requires each model to be approved, and they may not agree that both units can be approved under a single Model Number. Additionally there should be a clear indication in the application describing the differences between the models (please be sure the Operational Description is updated to describe all differences between the models).
Garmin: we concluded that will be one IC ID and one model because they are using the same radio and chipset transmitter. Other function could consider as minor. That is the reason why we create the model code as M/N: O4AHNH00.

I have a similar situation awhile back that I had contacted the IC officer as attached email for detail. We designed SDM4 first and then 01397 for many OEMs. The looks and function are slightly different but, the radio and chip are the same. They allow to use in one model as I asked on 6/25/10 email.

9. IC A1.2.1(c) requires antenna to be less gain than $\frac{1}{2}$ wave dipole, and block diagram shows this is a $\frac{1}{4}$ wavelength antenna. Please clearly show compliance with IC requirements.

CT - The OEM antenna is listed as 0dB which is less than that of a $\frac{1}{2}$ wave dipole.

10. Please note that the IC Application form uses the first character of Model and of Product code as the capital letter O, but this appears to be the number zero (0) in some other exhibits. Please confirm what character is correct and ensure all exhibits are consistent and correct (O or 0).

CT - O is the correct character. Exhibits are consistant.

11. An IC RSS-102 Annex A, B and C have been provided, but IC requires EITHER Annex A&B OR Annex C to be submitted (all 3 exhibits are not allowed). Additionally the Annex A shows a 100% duty Factor of 2.696mW, where the RSS-102 Technical Brief indicates 0.89% duty factor with power of 2.696mW.

CT - Corrected Appendix A

12. IC RSS-210 A1.2.1 (d) allows up to 8kHz authorized BW, but the emission designator Necessary BW is 8K30 (8.3kHz). The RF report seems to show the Emission Mask using an 8kHz Authorized BW, but this is not stated. Please revise your report to CLEARLY SPECIFY the requirements, the measurement procedures and the results. If the Emission Mask is drawn based on specific requirements, then specify the requirements.

CT - The 8k30 emissions designator was a template error. This has been corrected.

13. FCC 95.653 requires the user to be notified of installation/operation that could result in violation of the FCC Rules. It is not clear if this device could continually transmit when a button is pressed, and if continuous operation could either violate RF or RF Exposure requirements as a portable device. It is noted that the manual(s) do not contain any FCC information.

Garmin: Please refer to file "User Manual_ISPI_Dog_Device_NoNav_Warning Statements.pdf"

Response by: Garmin and CTL

Submitted by: CTL

Date: 3/25/14