

RE: Gyration  
FCC ID: JJ4-AS00258

1.) Neither the Manual or Label appear to have the two part statement of 15.19(a)(3). Since the device is so small I expect it is impractical to place this language on the device. If it exists in the manual and I have missed it please indicate where I may find it.

**Response: The 15.19 (a)(3) statement is located in page 11 of the user manual.**

2.) Please supplement the existing Internal Photographs with photographs of the device with the internal metal shield removed.

**Response: Per the customer the circuitry under the shield only contains the optical circuitry. It does not contain any RF circuitry. If you still need this to be take please let me know.**

3.) Rule 15.235(a) requires that all emissions in excess of 20 microvolt (26dB<sub>UV</sub>) be reported even if it passes the limits of 15.209. I am surprised not to see emissions reported for the second (99.65MHz), and seventh (348.775MHz) harmonics. Please review.

**Response: Emission repeated in Pk mode and checked second harmonic. Seventh harmonic was already included, but rechecked in Pk mode.**

4.) The limits of 15.235 are to be expressed in terms of average emissions not Quasi-Peak. Please review.

**Response: Since the modulation has a 100% duty cycle, pulse averaging is not applicable for this device.**

5.) What kind of modulation is shown? If this is carrier on-off pulses then a plot of the pulse train may be needed.

**Response: The modulation is FSK, so the signal has a 100% duty cycle.**

6.) FYI: Please note page 3 of 15 of your test report seems to indicate this device was tested to the limits of 15.247. This is obviously in error and should be corrected.

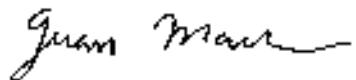
**Response: Report has been corrected.**

7.) Please provide an FRN for the Applicant. A new Form 731 is included for your convenience.

**Response: FRN number provided.**

Hopefully this answers all of your questions. Please contact me via [doc@elliottlabs.com](mailto:doc@elliottlabs.com) if you require more information.

Regards,

A handwritten signature in black ink that reads "Juan Martinez". The signature is fluid and cursive, with "Juan" on the top line and "Martinez" on the bottom line.

Juan Martinez  
Sr. EMC Engineer