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

November 6, 2002

RE: On Track Innovations Ltd.

FCC ID: JNX-OTI-SATURN

After a review of the submitted information, I have a few comments on the above referenced Application.

1) The operational description/users manual (Section 1.2) for this device states that the unit contains a serial protocol output capable of attaching to a host PC. If the unit contains an serial (RS232) output, then the EUT may be considered to be a composite device subject to both the requirements of a PC Peripheral & TX requirements if its intended use in some instances is to connected to a PC (requiring certification or DoC authorization, or possibly verification depending on intended use and Class A/Class B requirements). Please explain.

   Note: Proper DoC labeling/testing/compliance information has not been addressed. Proper test configuration for a PC peripheral device as specified in ANSI C63.4 does not appear to have been used. Additionally, if the device is intended only for Class A environments, then is should be labeled as such (users manual) even if it met with the Class B requirements.

2) The label should include the statements specified in 15.19(a)(3) (Note a correct copy was shown in the users manual). Please provide an updated label exhibit that includes the required statements.
3) The schematics of the TX show a BNC connector, which does not appear to be in the final product. Please explain.
4) The EUT appears to have been tested with a large ferrite placed on the RS232 Cable that was required to meet the technical requirements. Please provide an attestation from the manufacturer stating that this modification will be incorporated into all production models. If the intended environment for the device is class A environments instead of Class B, then the ferrite may not be necessary to meet the technical requirements. If Class A requirements are warranted, please provide new test data and test photographs for digital device emission from 30 MHz - 1 GHz without the ferrite attached and showing compliance with the Class A limits. Additionally, a justification for Class A use only should be provided and any affected exhibits (test report/manual) should be adjusted appropriately.

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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.