

Non-Conformities FCC ID: JQ6-SMARTID (CKC CS Ref # E08-000032-FCC-01)

The items listed below represent requests for information following review of this application for certification under United States (FCC) regulations. Further question may arise pending review of responses to these items.

OK	#	Non-Conformity or Comment	Submitted Response	Respondent / Date of Response
X	1	Please provide the RFID Tag return frequency (ies).	13.56MHz – the tag does not actually transmit – it only loads the transmitter signal	Todd Seeley/3-24-2008
X	2	The ID label provided does not meet the requirements of 2.925, the product code must be upper case letters or numbers. Please provide an updated label exhibit.	Updated Label Attached	Todd Seeley/3-24-2008
X	3	Please clarify FCC ID, the application form lists JQ6SMARTID while the ID Label lists JQ6-SMARTID. Please identify which is correct.	JQ6-SMARTID	Todd Seeley/3-24-2008
X	4	For 15.207, the test report “08012303.fcc.smartreader” on page 16 and “08012304.fcc.smarttrans1” on page 17 specifically omits data at the 13.56MHz carrier. Please validate that the AC conducted emissions are compliant with the required limits at the fundamental. Note: use of a dummy load for this test is permitted under FCC guidance note. Please note for future testing, the FCC declared nominal voltage in the US is 120VAC / 60Hz (this equipment tested at 110VAC).	There is a note that states that the Antenna was resistive terminated	Todd Seeley/3-24-2008
X	5	Test setup photos were provided from one of the test reports, however are missing for the other report. Please provide test setup photos from the other report to satisfy FCC filing requirements.	The test setup photos are identical between the 2 reports – the samples were tested at the same time just swapping out the unit – both units look identical.	Todd Seeley/3-24-2008
X	6	For both test reports please indicate whether the receive antenna was rotated about its axis in order to capture the maximum emissions in accordance with ANSI C63.4 test procedures..	The Receiving antenna Manipulation note is corrected	Todd Seeley/3-26-2008
X	7	Note: due to FCC mandate, CKC CS is obligated to request guidance for certain issues pertaining to this application. The following FCC KDB inquiries are presently pending: KDB 322301, and KDB 469498 <i>CKC CS cannot finalize your application without FCC response.</i>	KDB inquiry 469498 confirmed frequency stability testing is correct. KDB inquiry 322301 denied original confidentiality request; client chose to remove the item from the list of confidentiality requested.	Closed

X	8	<p>Please describe how the limit for 13.56MHz was derived. 15.225(a) limit is 15848 uV/m @30m or 84dBuV/m@30m. Please clarify if the appropriate emissions mask has been applied and whether the emissions reported represent compliance to this mask. Please clearly indicate compliance to current rules.</p>	<p>The 13.56MHz Limit is corrected</p> <p>The calculation was moved from Appendix 1 to the Mag Field Notes on the data sheet within the report</p> <p>The Appendix 1 was removed (appendix 1 had the incorrect calculation in it for field strength of MAG field emissions)</p>	<p>Todd Seeley/3-26-2008</p>
x	9	<p>CKC CS cannot seem to duplicate the method used to derive the values listed of the carrier field strength at 13.56MHz – we cannot reproduce the values listed. The method employed appears to be valid up to the last step where the method becomes unclear. Please expound on this method of determining the field strength at a distance other than tested. Additionally, please explain the rationale for the first assumption.</p>	<p>The 13.56MHz Limit is corrected</p> <p>The calculation was moved from Appendix 1 to the Mag Field Notes on the data sheet within the report</p> <p>The Appendix 1 was removed (appendix 1 had the incorrect calculation in it for field strength of MAG field emissions)</p>	<p>Todd Seeley/3-26-2008</p>
x	10	<p>FCC Reference KDB 148912. This application filing will have to be made with two separate FCC ID's per FCC response to this inquiry. Inquiry: We have a product which is currently under review for which there are two versions of the product; in one version, there is only a 13.56MHz transmitter and in the other there is the exact same 13.56MHz transmitter and a 125kHz transmitter (housed on a secondary PCB plug-in card). In the second product, the 125kHz transmitter meets the requirements of 15.201 for verification of the equipment. In the past if both transmitters are certified, the FCC has guided us to authorize the equipment under two FCC ID's due to the multiple frequency ranges listed on the grant (now noted in KDB 178919). Now in this case, since the secondary transmitter is verified, we assume that the client is correct and can certify the 13.56MHz transmitter (and it's variation) under one FCC ID since for that portion, it is an electrically identical device. Can the commission offer further comment on this scenario?</p> <p>Response:</p>	<p>I have additionally submitted an inquiry because the Certified 13.56MHz Radio portion is Electrically Identical between the 2 versions of product.</p> <p>The only changes are in the verified digital section of the main PWA – no changes in the RF section at all.</p> <p>Customer had FCC respond suggesting modular approval, customer approved additional application under E08-000044-FCC.</p>	<p>Todd Seeley/3-28-2008</p>

	<p>Independent of whether separate transmitter components within a final product are subject to Certification or Verification; final product versions with and without one transmitter component in general are not electrically identical and therefore require separate FCCIDs</p> <p>Please choose which product is going to be under this FCC ID and which is under a new FCC ID.</p>		
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