



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

October 1, 2002

RE: Savi Technology

FCC ID: KL7-640T-V1

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

- 1) The cover letter with this application asked about adding additional functionality under 15.209 (at a later time) as a permissive change. The original application filed is for a single TX to 15.231. In order to include the 15.209 functionality, it must be done at the time of the original application since removal of the functionality would be considered a subset. We can not change the application at a later date into a composite application since this would be changing the device in a way that is not allowed by 2.1043. Please let us know if you wish to place this application on hold or to proceed with the filing as is.
- 2) Since 2 models were tested, are test configuration photographs available for both models?
- 3) The test configurations specified on page 4 & 9 of 12 states that the EUT was tested at 10 meters. The TX tests should have been performed at 3 meters, and the digital device/idle mode at 10 meters for class A. However, the individual test tables appear to all be labeled 3 meters. Please clarify.
- 4) Please comment on if the receiver is a superheterodyne design requiring to be tested to the 2nd LO or if this device should have been tested to 2 GHz per 15.33. Please note that the device was only tested from 30-900 MHz according to the test report.
- 5) The test report contains 2 different sets of TX timing. The theory of operation explains a signpost mode that correlates to the first set of timing given (contains 4 pulses of data per period). The theory of operation also explains a beacon mode (single transmission sent be TX period). But the other timing provided contains 10 pulses of data and is not contained in the theory of operation. Please explain.
- 6) Please explain the duty cycle of the transmitter during the radiated tests. Was it only transmitting once per 10 seconds, or was it placed into a more continuous TX pattern for test purposes? If the device was only transmitting once per 10 seconds, please explain any special procedures used during test to ensure the worse case results were obtained. The concern is due to the close margin and the difficulty in obtaining worse case results during table rotation and antenna height if the device was not in a more continuous transmit condition.

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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.