



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

May 6, 2004

RE: Savi Technology

FCC ID: KL7-650MR-V2

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

**Administrative/General:**

- 1) The 433 MHz test photos show the device with the antenna lying down. The antenna should have been positioned in an upright position for the test. Recent interpretations from the FCC have stressed this fact. Note the report mentions all 3 axis. Please confirm this was performed and if so, are additional photos available.
- 2) The test report justifies the use of previous data for the 123 kHz from a previous model. However, the previous model did not contain the 433 MHz antenna. Additionally, from the schematics both the 433 MHz and 123 MHz antennas in this model are fed from a single feed point without any selective switch for which antenna should be used for a particular TX cycle. The addition of this circuitry changes the loading conditions of the antenna and will likely have an affect on the previous test results at 123 kHz. Due to the changes of loading conditions it would seem that that the validity of the previous test results can not be assumed.
- 3) Please explain what is meant on page 2 of 9 when the report states "when operated under 15.209 rules, 433.92 MHz transmission may be continuous. Shouldn't all 433.92 MHz emissions be classified under 15.231 (a) & (e) and non-continuous in nature?"
- 4) Page 9 of 19 mentions no modifications necessary, but modifications appear to be listed throughout the report. Please clarify.
- 5) Please provide test measurements to show the 24% and 10% duty factors, as well as compliance to the 5 second automatic shut off and 30\*/10 second repetition rate requirements of 15.231

Timothy R. Johnson  
Examining Engineer

[mailto: tjohnson@AmericanTCB.com](mailto:tjohnson@AmericanTCB.com)

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.