

KL7-650MR-V2

1) There is a discrepancy on what rule part(s) that the 433 MHz signal operates under. The rules parts listed in the test report's general description and the theory of operations do not agree. If under 15.209, as indicated in the general description in the test report, where is the data?

The 433 MHz signal operates under 15.231. Although the test report mentions operation of the 433 MHz TRx under 15.209, this is clarified both in the report and in the following response provided to American TCB after they also questioned the references to 15.209 for the 433 MHz TRx: *"This statement applied to the previous model to which this data applies, since we did not retest the 123 kHz transmitter but needed to include the data for a complete record. However, the -21x models that this application is for do not have 15.209 UHF transmissions. See page 8 of 19 of the report."*

2) The device transmits multiple signals. Please provide a list of all signals, the duration of all signals, the time between all signals, the rule part applied for each signal and indicate how each signal is activated.

The 433 MHz signal operates both 15.231a and e. Timing plots are provided in the document SMR-650P Duty Cycle Plots to demonstrate compliance with 15.231a or 15.231e as appropriate.

The Theory of Operation explains operation under 15.231a in section 2.2. These signals activate and control a RFID tag with three signals: wake-up signal that lasts for 2.5 seconds and is manually initiated, a hello control signal that lasts for 2.7ms and is manually initiated and a series of sleep command signals, each of which lasts for ~5.9ms with a duty cycle of < 10% and a burst duration of < 5seconds. The sleep signals are all automatically triggered based on the number of tags that respond (one sleep command transmitted to each tag that responds to the hello command).

The Theory of Operation explains operation under 15.231e in section 2.3. This data signal sends a burst of data signals to an RFID tag. Each signal has a duration of ~10ms and a maximum duration of the burst of 1 second. There is a minimum of 30 seconds between successive data burst transmissions to meet 15.231e.