



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

January 27, 2004

RE: Savi Technology

FCC ID: KL7-650R-V1

I have a few comments on the above referenced Application.

EMC Report

- 1) Please explain the purpose of 2 identical transmitters in the unit. The theory of operation does not bring up this issue. Are they ever expected to transmit at the same time? If so, how does this affect the measurements made?
- 2) Under the Data mode, it is not certain what is meant by the 30% duty cycle given in the operational description.
- 3) The users manual (installation page 7 of 40) mentions an adjustable range. Please explain what is meant by this and its affect on the testing performed.
- 4) The device was tested face down. Has any testing been performed with the device face up vs. face down to ensure there is little difference in the results due to positioning of the unit relative to ground plane orientation, etc?
- 5) Average readings on page 6 of 12 should have been made by correcting the peak reading by 10.5 dB as specified. However, the delta between peak and average varies from approximately 4 to 15 dB. Note that when pulsed emissions are employed, the accepted methodology is to obtain the average measurement by correction of the peak measurement with an appropriate duty cycle factor. Average measurements are not typically acceptable for pulsed emissions. Please explain.
- 6) Please provide information regarding the RBW and VBW settings used for various tests.
- 7) FYI...Proposed Grant Notes: Collection Mode of operation meets with the requirements of 15.231(a)(1) & (a)(2). Data Transmission Mode of operation meets with the requirements of 15.231(e) and is permitted with a duration of no more than one second and the silent period between transmissions shall be at least 30 times the duration of the transmission, but in no case less than 10 seconds.

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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.