



American TCB

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September 25, 2008

RE: ATCB006790 FCC ID: KL7-650R-V2 & IC: 2404A-650R1

Attention: Richard Fabina

Please find our responses to your comments on this application below:

1. Please provide a new copy of the IC application form that bears handwritten or digitally verifiable signatures on it. The IC application form provided did not have these types of signatures on it.

[We have printed out the file and signed it and scanned it and this file has been uploaded. For future applications, can you please provide a file that allows the signature to be inserted?](#)

2. The IC agent letter appoints ATCB as the agent for Savi Technology on this application but a staff member from Elliott Laboratories has signed important documents for this application. Please provide a new IC agent letter that appoints Elliott Laboratories as an agent for this application. Make sure that this letter bears a handwritten or electronically verifiable signature as noted in item 1 above.

[A new agent letter has been uploaded.](#)

3. The IC confidentiality request letter incorrectly lists the model number as the IC number on it. Please provide an amended IC confidentiality request letter that shows the IC number as 2402A-650R1 not SR-650-101-CA.

[A new confidentiality request letter has been uploaded.](#)

4. Rod Thorne is listed as the contact person for Savi Technology, Inc. (Savi) on the FCC Grantee Code database. As such, he is the authorized person to sign the FCC letter exhibits for Savi. Unfortunately Eugene Schlindwein has signed these letters submitted with this application. Please either provide a letter from Rod Thorne giving Eugene Schlindwein the authority to sign these letters for Savi on this application or submit new FCC letter exhibits signed by Rod Thorne. Alternatively you can have the FCC Grantee Code Database changed to show Eugene Schlindwein as the contact person for Savi. If you need help in getting the FCC Grantee Code Database changed, please contact Ms. Marianne Bosley of ATCB by email at [Marianne@atcb.com](mailto:Marianne@atcb.com).

[We have uploaded a letter authorizing Eugene Schlindwein to sign on behalf of Rod Thorne.](#)

5. Please provide an Annex B of RSS-102 for the IC application. In accordance with the second sentence of Section 2.5 of RSS-102, if the EUT meets the exemptions in Sections 2.5.1 or 2.5.2 of RSS-102, only a signed declaration of compliance (Annex B) needs to be submitted.

[Refer to the file uploaded "RSS-102 Form 1.pdf"](#)

6. Please confirm that the 15.240 mode of operation meets the requirements in the penultimate and last sentences of Section 15.240(b) of the FCC Rules to limit time of each transmission to be no greater than 60 seconds and to remain silent between normal transmissions for a period of at least 10 seconds. I see no mention of these requirements in the submitted operational description.

The 15.240 timing definition appeared in Section 6.6.2, page 16 of the Theory of Operation. Enclosed is a revised Theory of Operation with the same information added to the 15.240 timing definition in Section 5.2, page 6, and Section 6.5, Page 14.

7. Please provide several spectrum analyzer plots showing the duty cycle from this transmitter to support the -4.4 dB duty cycle correction factor used in the test report. No duty cycle plots were provided.

Please remove the wave forms file from the test report folder. I have uploaded a file to the Operational description folder which explains the duty cycle plots.

8. Please explain the level settings of 48 and 58 used for the control and wake up signals Factor at the tested field strength is 60%.respectively in the test report during radiated emissions measurements. I see no mention of level settings anywhere in the operational description. If the device has higher level settings, how will the individual installer be provided with information that the highest level setting for control and wake up signals are limited to 48 and 58 respectively?

The transmission power level settings of 48 and 58 are arbitrary internal values used in the operating firmware code controlling the RF Transceiver attenuator. These values are determined as part of the manufacturing processes whereby a reference RF drive level is established for the circuit, and each unit's power gain is factory calibrated to produce RF power resulting in field strength less than that appearing in the Test Report data submitted with the Application. The value is recorded in the Test Report so as to establish the correct RF level for manufacturing and assure reproducibility traceable to the Test Report measurements.

This firmware code is installed at the factory, runs autonomously and is not accessible by installers, operators or users. Therefore, there are no instructions required for installers.

The field strength limits are established by Section 15.231 and by the averaging method of Section 15.35

9. For Your Information – Please only provide documents for the applications being reviewed. For example, I am reviewing this device for FCC and IC approval. There is no need to supply labels for CE, Notified Body and Australian approvals as part of this application. Supplying additional information just slows down an equipment approval review. Your cooperation is appreciated.

[Noted](#)

10. For Your Information 2- The FCC typically requires separate test reports for different portions of a composite device. I note that both 15.231 and 15.240 test results are contained in the same test report even though you assign different names to each report. Since this device uses the same operating frequency for both of these devices, I will use the submitted test reports. If the FCC audits this application, please note that you may be required to file separate test reports (not identical test reports) for the test results for Sections 15.231 and 15.240 of the FCC Rules.

[We will make sure to provide only the data](#)

11. **From separate email:** I noticed that the address for Company Number 2404A on the IC database is not the one shown on the submitted IC application for this device. I will use the address shown on the IC database when preparing the TAC for this application. If you want the address changed, you must contact IC directly.

[An email has been sent to Industry Canada advising them of the correct address.](#)

Regards,



David W. Bare  
Chief Engineer