

American TCB

February 20, 2009

RE: FCC ID: KL7-656T-V1 and IC: 2404A-656T for Savi Technology

Attention: Richard Fabina

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

1. Please provide evidence that the continuous transmission (non-pulsed operation) from this pulsed emission transmitter exceeds the 20 Hertz repetition rate requirement in the note at the end of Section 15.35(a) of the FCC Rules for making CISPR quasi-peak measurements at 866 MHz. Alternatively you can remeasure the quasi-peak emissions at 866 MHz using a peak detector and correct them with the duty cycle correction factor.

All of the testing was performed using special code in the EUT that caused it to transmit continuously, so there is no need to consider repetition rate. The report will be amended to clearly state this, as currently it must be inferred from the note about average readings being calculated from the peak amplitudes using a duty cycle correction factor

2. Please have the manufacturer confirm that no device will be manufactured or installed with a power level setting that exceeds level 129 as specified in the modifications to the EUT section of the test report on page 4 of 8 of the EMC Test Data.

The statement about modification of the EUT in the test data is incorrect. This tag does not have software control settings. The power is set by a resistor value. This value is selected during the manufacturing process to match the RF output power of the sample tested. We will provide an updated report without this modification statement and a revised attestation letter explaining how power is set for production samples.

3. Please provide a photo showing the location of the model number sticker and the applicant's name sticker on this device. This info is needed to determine if the device labeling complies with Section 5.2 of RSS-Gen Issue 2 dated June 2007. Only a photo showing the location of the FCC and IC Certification numbers has been provided.

We have uploaded a revised document showing the location of the name and model number labels.

4. The two part statement required by Section 15.19(a)(3) of the FCC Rules appears to be found only in the user manual. Note that the FCC allows this statement to be located on a device only if the device is smaller than 8 by 10 cm in size. Since the user manual indicates that this device is larger than 8 by 10 cm, please provide a photo showing the location of the two part statement on the actual device.

The new label placement drawing will be clearly show that a label with the statement required by 15.19(a) is placed on the device.

Regards,

A handwritten signature in blue ink that reads "David Guidotti". The signature is written in a cursive style with a large initial 'D'.

David Guidotti
Senior Technical Writer