

RE: ATCB004763 for SAVI Technology, Inc.

FCC ID: KL7-662T-V2

1. The address listed for SAVI Technology, Inc. on the ATCB application form does not agree with the address for Grantee Code KL7 given in the FCC database. Please correct either the ATCB application form or the FCC database accordingly.

Response: The ATCB applications forms have been corrected.

2. The letter requesting confidentiality does not reference Sections 0.457 or 0.459 of the FCC Rules. Please amend this letter accordingly.

Response: Amended letter for confidentiality corrected and uploaded.

3. Section 15.35(a) of the FCC Rules states that when a limit below 1000 MHz is specified as a quasi-peak limit, the note at the end of this section requires a peak detector measurement when the pulse repetition frequency (PRF) is less than 20 Hertz. The PRF for this device is 10 Hertz. Please remeasure all spurious emissions for all operating modes below 1000 MHz with a peak detector and report the results.

Response: The QP in the data is a typo and the correct detector used was Peak. The signal was set to a CW signal to facilitate testing when measuring the radiated emissions. Revised report uploaded.

4. The average data submitted on page 15 of the test report is flawed. For example, the average level for the upright EUT position at 0 degrees azimuth and 1.2 meter antenna height should be 70.5 (90.5 peak level – 20 dB correction factor) not 20.5 as shown. Similar errors are shown for all the other average values. Please correct these values and resubmit the data.

Response: The results have been corrected. Revised report uploaded.

5. Section 15.240(f) of the FCC Rules requires SAVI to initially register each location where this equipment is being installed. Please provide an attestation letter exhibit that specifies SAVI will register each site at initial installation, what information you will register and with whom you will register the information.

Response: Attestation letter uploaded.

6. Section 15.240(f) of the Rules requires SAVI to inform the user of the requirements of the operational restrictions in paragraphs (a) and (e) of this section for use of this equipment. In addition, the manual must also inform the user that they are responsible for submitting updated information in the event that the operating location or other information changes after the initial registration. The manual must inform the user what information to provide along with the address where to submit the information. Please provide the appropriate user manual information and confirm that it will be included into the final version of the manual.

Response: The device is a TAG and not a reader. No manual statement is required.

7. Your Exemption from Routine Evaluation per Section 2.5.2 of RSS-102 states that your EIRP is less than 5 milliwatts. This section requires a demonstration how the EIRP was derived for this device. Please provide an EIRP calculation.

Response: RSS-102 Section 2.5.2 states that the information contained in the RF exposure technical brief “may be limited” to information that demonstrates how the e.i.r.p. was derived. I believe that their referring to that fact that the RF exposure technical brief form only states what the exposure levels are and will not give information as to how the EIRP was derived. But, I don’t see how this statement is seen as a requirement. Either way I have included an EIRP calculation for you review as requested.

Maximum Fundamental Field Strength Measured at 3 meters = 90.5 dBuV/m
Conversion Factor used convert dBuV/m to dBm at 3 meters = 95.2 dB

$$90.5 \text{ dBuV/m} - 95.2 \text{ dB} = -4.7 \text{ dBm}$$

8. Section 7.2.4 of RSS-Gen requires frequency stability testing for this device. No data was provided in the submitted test report. Please submit frequency stability test data for this transmitter in accordance with RSS-Gen, Section 7.2.4.

Response: RSS-210 section 2.1 states, “When the carrier frequency stability is not specified, it need not be tested...”. In Annex 1 of the RSS-210 there is no reference to performing frequency stability for the 260 - 470 MHz range. The only frequency range that is required to be tested, as stated in section A1.1.4 of the RSS-210, is 40.66-40.70 MHz. I believe that no frequency stability is required for this device.

9. Section 4.6 of RSS-Gen also requires an output power to be calculated or measured. Fundamental field strength was measured and compared to the limit but no output power was calculated as prescribed. Please calculate the output power of this device as required and submit the results.

Response: The following formula from section 4.6 was used to calculate the power in dBm:

$$TP = (FS \times D)^2 / (30 \times G)$$

FS = Field strength in V/m

D = Test distance

G = is the antenna numerical gain referenced to isotropic gain

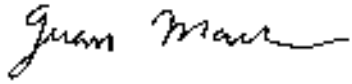
$$10^{(90.5 \text{ dBuV/m} / 20)} / 1,000,000 = 0.033 \text{ V/m}$$

$$TP = (0.033 \times 3)^2 / 30 \times 1 = 0.0003366 \text{ Watts}$$

$$10 \times \log(0.0003366 \times 1000) = -4.7 \text{ dBm}$$

Any other questions please let me know.

Regards,

A handwritten signature in black ink that reads "Juan Martinez". The signature is written in a cursive style with a long horizontal flourish at the end.

Juan Martinez
Sr. EMC Engineer