

American TCB

February 18, 2009

RE: FCC ID: KL7-674T-V2 IC: 2404A-674T

Attention: Rich Fabina

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

1. Please submit an amended FCC & IC label showing the Certification numbers, model numbers and applicant name on the label or the device. The recently submitted FCC & IC label shows the wrong FCC and IC numbers and the wrong model number. The model numbers listed on the IC application form are ST-674-030 and ST-674-030-NSN but the model number shown in the submitted label is ST-654-031. In addition, this application is for two model numbers but only one model number is shown in the label submitted. Please submit labels showing the location of both the model numbers or include a statement on the label showing the location of one model number that other model number will be in the exact same location on the device.

[We have uploaded a revised document showing the label locations](#)

2. The FCC requires devices larger than 8 x 10 cm to have the warning statement from Section 15.19(a)(3) of the Rules to be on the device. This warning statement for this device is located in the user manual but the device is 15.8 x 5.4 cm in size. I'm assuming this is on each side so device is twice the 15.8 x 5.4 cm size and the warning statement should be on the device. Please provide either an explanation on why my assumption on the device size is wrong or provide a label showing the location of the warning statement on the device.

[2 part warning statement added to label location.](#)

3. I've read your response on the EUT transmitting continuously and here is my concern...I've asked other Labs if the transmitter was transmitting continuously and they replied "Yes" but I've found out later that the transmitter was transmitting its pulses every time they were supposed to be transmitted. In that particular case, the transmission was once every 4.6 seconds and the transmission lasted for only 2.5 milliseconds. So "transmitting continuously" means different things to different people. The FCC is concerned when CISPR quasi-peak measurements are made that the PRF is greater than 20 Hertz. I think what you need to say is the transmitter is sending a CW emission for ease of testing. If the response to TCB questions contained this, I would not require the test reports to be modified (that's a lot of extra work that is not needed). I'll just upload the response with the statement about CW emissions and be done with the project.

[The special software put the device into a continuous wave transmission mode.](#)

4. Section 2.1033(b)(7) of the FCC Rules requires the following “A sufficient number of photographs to clearly show the exterior appearance, the construction, the component placement on the chassis, and the chassis assembly.” For Part 15, unlicensed devices – unless modular approval applies – the FCC has historically required complete photos of the internal portions of the device. I have not heard of any FCC interpretation stating otherwise. Nevertheless, ATCB has submitted an inquiry to the FCC on your question about providing photos of all boards in a device. It may take a while to receive a response from the FCC. Optionally to avoid holding up the application on this issue alone, you may submit the requested photos.

[Uploaded “Additional Internal Photos.pdf” to internal photographs](#)

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