

American TCB

November 21, 2005

RE: Savi. FCC ID: KL7-676T-V1_ATCB002931

Attention: Dennis Ward

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

1) Please note that it appears that you have the same identical transmitter under three different rule parts (15.231a, 15.231e and 15.240). If this is in agreement with the FCC, please provide the associated documentation if available.

Waiting for letter from FCC/Savi to state that this is ok.

2) Please note that the device appears to be more than sufficiently large to contain the 2-condition statement on the device as required by 15.19. If you feel that this statement is justified to be in the manual and not on the device, please provide sufficient evidence to support the exclusion provided in 15.19(a)(5). Otherwise, please provide a label which contains the appropriate 2-conditions statement.

An additional label with the two-part statement will be placed on the product. Label drawing and picture showing location have been uploaded.

3) Please note that while you state that the duty cycle is 10%, there is no evidence in the test report to support this statement. Please provide measured duty cycle data to support the 10% duty cycle.

Plots have been provided to demonstrate duty cycles not exceeding 10% for data signals (15.231e), 25% for control signals operating under 15.231a and under 15.240.

4) Please note that while you state that the duty cycle for operation under 15.240 is 25%, there is no evidence in the test report to support this statement. Please provide measured duty cycle data to support the 25% duty cycle statement.

Plots have been provided to demonstrate duty cycles not exceeding 10% for data signals (15.231e), 25% for control signals operating under 15.231a and under 15.240.

5) Please note that it does not appear from the report that all modes of transmission as specified in the operational description have been tested. Please explain how the test report adequately addresses all aspects of the transmitter as applied to each specific rule part and please provide evidence that all modes of transmission as defined in the operational description are compliant to the appropriate rule part for which the device is to be certified.

Plots have been provided to demonstrate compliance with the timing restrictions of 15.231(a) [5 second maximum transmission time]; 15231(e) [1 second transmission time and silent period of at least 30 times the transmission duration and not less than 10 seconds]; 15.240 [transmission duration not to exceed 60 seconds with a minimum silent period of 10seconds between transmissions].

6) Please note that page 11 states that the device did not require modifications, however, page 33 says a resistor was changed to increase power. Was this resistor change in all test configurations? If not, please retest all configurations using this modification. Also, what evidence is provided that this resistor change will be incorporated into all subsequent production items? Please explain.

The resistor is used to set the output power. The value was set by the first series of measurements to obtain the required fundamental signal level and then remained the same for all subsequent measurements. Savi use the tested sample as a benchmark unit to set output power for all production units to ensure the output power for each unit does not exceed that of the sample tested.

Regards,



Mark Briggs
Principal Engineer