

September 29, 2008  
RE: Raven Industries  
FCC ID: KSME1007580

The following is in response to the comments made on the above referenced application.

1) Please justify testing positioning. Generally multiple device configurations should be located along front/back edges of the table per ANSI C63.4.

The test setup used depicts the worst case configuration observed while moving the motors and associated components, and is configured in a more representative arrangement (this system is installed within a bed frame). Note that the configurations in ANSI C63.4 are depicted only for table top and floor standing equipment, neither of which classifies this particular device.

2) For AC powerline emissions, generally the EUT is on the rear of the table and C63.4 stipulates 40 cm from the EUT and back of the table. It does not appear this positioning was followed.

As above, the configuration used was considered to be worst case as the system in question does not meet the classifications depicted in ANSI C63.4. The table is maintained at a distance of 40 cm from the rear wall, as required in the standard.

3) FYI...RF exposure information may be removed from manual if desired for 15.249 devices.

4) It is noted that the OEM is providing information about what to put into the manual. Please provide a final copy of what they are instructing to others. The information does not appear in final form and also is included with more a theory of operation and test instructions. Also, please note that according to information released by the FCC this past week, they are pushing to have final manuals provided and not just draft. They cited:

2.1033(b)(3) and 2.1033(c)(3) state: "A Draft copy of the instructions may be submitted if the actual document is not available. The actual document shall be furnished to the FCC when it becomes available." So while the rules do not specify a time limit, we must advise the grantee that the manual has to be available prior to marketing in order for the grant to be effective. The FCC is asking this to be provided for upload to the application.

Additionally please note that a TCB only has access to upload files for 30 days from the day of grant therefore after 30 days, a TCB would have to request an Audit mode to be able to upload via easadmin@fcc.gov. This will likely incur an additional charge for these cases.

The User's Manual has been updated.

5) This device appears to have more functions other than activation of TX under digital device definitions of 15.3. It would appear that the statements of 15.105 may apply in the manual due to functional aspects of the remaining portion of the device. Please review.

The Class B paragraph of 15.105 has been included in the revised manual statement.

6) This device appears to have AC powerline emissions. Please ensure appropriate test equipment is listed.

Test report has been updated.

7) For AC powerline conducted, one measurement was made for average, QP and PK. Average exceeds Peak. Please explain.

Typographical error. The test report has been corrected.

IC Specific:

8) The model numbers shown on the IC form are all preceded by "KSM", but the labels do not show "KSM". Please review.

Typographical error. The associated documents have been corrected.

9) FYI...In the future, kindly ensure 99% bandwidth is done per FCC requirements. If using 20 dB, it is typically 20 dB down from the power, not simply the bandwidth trace. See IC document provided separately. Kindly note that some modulations such as ASK or similar would likely yield the same results. However modulations such as given here will vary.