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Hi Doug,

Below are our answers (and one question) to your request. Let me know if this does not answer your questions.

Best regards,
Bill Stumpf

Q2) The label has the FCC logo on it please justify this. It should only be used in cases of Declaration of Conformity. Please justify if you want to have the logo on the label.

A2: This device is a transmitter/receiver and therefore the receiver is subject to DoC under Part 15 Rules. Therefore the FCC logo is needed.

Q3)

The limits for 15.231 at 433.95 MHz are 108.8 Peak and 80.8 Average. The test report on page 53 states that the readings are all peak when the limit you have for the fundamental is average.

15.231 (3):

(3) The limits on the field strength of the spurious emissions in the above table are based on the fundamental frequency of the intentional radiator. Spurious emissions shall be attenuated to the average (or, alternatively, CISPR quasi-peak) limits shown in this table or to the general limits shown in §15.209, whichever limit permits a higher field strength.

Are you using average limits for all data on page 53? Please explain.

A3:

The limits are Average limits. CFR 15.35(c) was applied for measuring pulsed emissions. The average field strength was determined by measuring the absolute voltage during a 100 ms interval (using a Peak detector). This value was then corrected by applying a duty cycle correction factor to the measured value. This correction is calculated from $20 \log(\text{ON time}/100\text{ms})$.

The peak limits are 20 dB higher than the average limits as stated in CFR 15.35(b). The peak levels of the emissions are found in the table before the averaging (using the duty cycle correction factor) is applied. The peak values are only 9.66 dB higher than the average values. Therefore the peak limits are met.