

May 4, 2005

RE: Delphi Delco Electronics Systems

FCC ID: L2C0029TR

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

1) Where is 2 part statement on label?

The ID label Exhibit has been updated to show the Interference statement clearly. It is molded into the DUT case just below the label.

2) Grant should not report power for this.

I believe this is with regard to the following question.

3) This is NOT a DTS device....It should be approved only under 15.249

It was unknown to us that the DTS designation was restricted to 15.247 devices. Per our conversation with you, we have modified the application forms to use the Equipment Classification: DXX

4) Section 6.1 of the report should likely cite 15.109.

The report has been updated to cite 15.109.

5) LISN setup does not appear to be in compliance with ANSI C63.4 positioning/mounting requirements. Please review.

The cable from the DUT to the LISN appears to have come loose from its bundle. We have retested the DUT for conducted emissions and found no change in the conducted emissions. An updated test setup photo has been provided and new conducted emissions data has been added to the test report. In addition, we have moved our LISN networks behind the test table, rather than under the test table, to better ensure compliance with the 80 cm rule in C63.4 as requested.

6) Additionally, the Figure 6.15 suggests a 6 dB difference with the voltage dropped to 85% (see 15.31(e)). This appears a little larger than expected and also suggests that some of the in band data or harmonics may be dramatically affected and possibly exceed the limits under these conditions. Please review.

After examination by the manufacturer, it was determined that a 5V voltage regulator (U404) was unable to remain stable as the supply voltage from the transformer decreased due to supply voltage variation. Once the supply voltage from the transformer decreased such that the dropout voltage on the regulator could no longer be maintained, the regulator would cycle the DUT on and off irregularly. To resolve the issue, the 5V regulator was replaced with another regulator (same package) with a reduced dropout voltage. The Parts List exhibit has been updated to reflect the changes made.

The DUT with a new regulator was measured by our laboratory for conducted and radiated emissions. New conducted emissions are provided in the revised test report, along with a new voltage variation plot. Digital radiated emissions did not show any change. Emissions at the fundamental were tested and exhibited a change of less than 0.2 dB, justifying that the data already collected is valid for demonstration of compliance.