

1. Please update the 731 form for an equipment code of DXX.
[Updated 731 form 10/4/06. Copy sent to T. Johnson same day. Uploaded revised form to ATCB web 10/5/06.](#)
2. Cover Letters (i.e. requesting confidentiality or short term confidentiality) have not been provided and for most application of this type, this is typically provided. Please provide or explain if this is not relevant. Please see additional memo provided regarding the difference between short term and normal confidentiality. Additionally, please see sample provided.
[Updated signature block on confidential request. Sent copy of signed form to T. Johnson 10/5/06. Uploaded new letter to ATCB sight 10/5/06.](#)
3. For external photographs, please include photographs showing the back. Please provide additional photographs showing any ports the device may have as well.
[Updated external photos to include views of back and all ports, to include docking stations ports. Sent a copy to T. Johnson 10/4/06. Uploaded new file to ATCB web 10/5/06.](#)
4. Internal photographs are a good start. However, please provide an additional photograph of just the top and bottom of all boards (careful to avoid dark and flash spots). Additionally, any shields present must also have an additional photograph showing the shield removed (this may be close up or whole board as necessary to see detail under the shield).
[Updated file to include picture of PCB without shield over RF section. Sent copy to T. Johnson 10/4/06. Uploaded to ATCB web 10/5/06.](#)
5. Labeling format by FCC requires "FCC ID:" not "FCC:". Please correct.
[Internal drawings reflect proper verbiage. Label was printed wrong. New labels will be printed within the next day. I will forward pictures at that time. Labels corrected and pictures sent 6 October 06.](#)
6. Labeling exhibit requires the FCC ID be shown on the label itself, not simply an arrow pointing to where XXX is shown. Please correct.
[I am forwarding a copy of our label print. A picture of the device with the new label will be sent in the next two days. Label picture was sent to T. Johnson, 5 Oct 06. Data uploaded to ATCB web site 6 Oct 06](#)
7. The user's manual appears to be missing the information required by 15.105 (this device is more than simply a TX or RX). Please review/correct/ and/or explain as necessary.
[We are updating the literature and this comment is included in the 'Sure Connect' literature.](#)
8. This device appears to be capable of USB connection to a PC and is therefore also considered a PC peripheral device (in addition to the TX requirements, i.e. Part 15.239, etc.) and is subject to either a Certification or DoC as a PC peripheral. Therefore the application must clarify if you are asking for:
 - a) Certification of the device as a TX, and a DoC has been performed by an appropriately accredited test lab for a PC peripheral
 - b) Certification as a TX + PC peripheral.

Note 1: The option b) would be considered as a composite application and 2 certificates (one for the TX, one for the PC peripheral portion) would be issued. Note that there are additional review costs associated with this additional certification.

Note 2: To qualify to perform DoC applications, the test lab must be accredited (i.e. NVLAP or A2LA) to perform testing under the DoC procedure.

Note 3: Note that for DoC tests, the device is configured with a minimum test configuration as specified by ANSI C63.4 which includes complete computer + 2 I/O devices attached (one may be the EUT) during this particular test. Test photos currently do not cover a correct PC peripheral device configuration. However some information in the report suggests testing of USB transfer but it is uncertain as to if the final configuration met with C63.4.

Note 4: Each path (DoC or Certification) has particular labeling requirements that must be followed. For DoC authorizations, the label should also include specific DoC labeling information and also the user's manual should include information regarding Part 2.1077. If the device is Certified, the FCC ID and current labeling requirements for the TX will cover the labeling requirements. However, additional grants are generated and review costs are higher. Note that currently labeling and users manual do not appear to support a DoC. The manufacturer does have a choice of DoC or Certification, however the device

- labeling and manual information must match the appropriate methods used.
Additional testing is being accomplished at FAU during the week of 9 Oct 06 to ensure completeness information when making DoC. We are requesting certification to 15.239.
9. For tests in mobile modes, the device should be positioned in each of 3 axis in effort to obtain worse case positioning per ANSI C63.4 for portable devices. It is uncertain if this was done. Please explain.
Additional testing is being scheduled for week of 10/9/06. Will make available if requested by FCC.
 10. It is uncertain if cables were manipulated in effort to obtain worse case data. Has cable placement been explored?
Cable orientation was placed in order to meet the intent of C63.4. Just by coincidence the headphone cables are orthogonal to the receive antenna. This should be worse case.
 11. Generally the FCC expects all inputs and outputs to be filled during testing and following published requirements of ANSI C63.4. For radiated tests, please define what ports were utilized and justify as appropriate why certain ports may not be filled (i.e. there is a concern with the audio ports) Please explain, justify, or correct.
All ports that were accessible during a particular test were 'loaded.' For example: in the car dock test the line in/ line out/ headphone/ antenna in and cigarette lighter adapter were loaded.
 12. For in vehicle testing, the test report shows that the lowest and highest channels do not appear to be used for testing (88.7 vs 88.1 MHz and 107.1 vs. 107.9). In absence of some compelling argument, the FCC asks that the lowest and highest actually be used – especially for occupied bandwidth tests. Note that 731 form cites 88.1 – 107.9 MHz. Please review.
High level ambient signals present at the OATS made testing of 88.1 and 107.9 impractical. Available frequencies were selected as close to the low, mid, and high end of the usable frequency range as possible. For occupied BW, 88.1 MHz and 107.9 MHz were used, as required.
 13. Test equipment for AC conducted emissions do not appear to be provided. Please update.
I believe this information is located on pp 5 and 51 of the report. Please let me know if you are looking for additional information.
 14. It is uncertain what type of glass antennas were present in each vehicle tested and their location. Please provide photographs or information as appropriate to document this.
The vehicles utilized represented three different styles of backlight antennas from three different OEM 's. Additional photographs were uploaded 6 Oct 06.
 15. Test photographs showing the general test site setup (receive antenna and vehicle) for the in vehicle tests should also be provide as part of the test setup photographs.
We do have good pictures of the test site. They are more specific to the vehicles and not the test site. Updated photo file to include other vehicles and XM Sure Connect placement. E-mailed a copy of this file to T. Johnson 10/6/06 and uploaded file to the ATCB web site 10/6/06.
 16. It is uncertain if all test photographs currently provided are correctly labeled. A semi-portable configuration appears to be labeled as a car cradle configuration. Please confirm all proper photographs are provided and labeled properly.
Corrected labeling of pictures. E-mailed new file to T. Johnson, 10/6/06. Uploaded to ATCB web 10/6/06
 17. The manual mentions Audio Level adjustment (page 42/45). Please comment on how this was adjusted to ensure maximum levels during testing (drive levels, etc.). Please ensure both radiated and occupied bandwidth tests have been performed utilizing maximum user controllable drive levels.
The digital inputs selected at such a level that provided the maximum audio output from the DAC.
 18. Test antenna and preamp (if applicable) do not appear to be provided for OAT's testing.
I believe this information is located on p51 'In Vehicle Test Setup. Please contact me if you need anything else.
 19. FYI.....Regarding short term confidentiality (if it will be requested), you are responsible for the following:
 - a) Note that any documents held under the short-term confidentiality will automatically become

public after 45 days. A manufacturer may extend this period up to an additional 45 days. This requires an additional cover letter requesting this extension must be submitted to ATCB a minimum of 7 days prior to the expiration of the original 45 day temporary grant of confidentiality.

b) If the manufacturer engages in public marketing activities or otherwise publicizes the device prior to the expiration of the short-term confidentiality period, the applicant must immediately notify ATCB so the exhibits can be made publicly available.

[I understand. There are pictures of this product on the internet. However, i do not believe we, Delphi, have gone thru a formal release.](#)

20. FYI..... Although we are processing this application, as of September 12, 2006 we are also required to work with the FCC to pre-review 15.239 applications and also for FCC to authorize us to release the grants. We must rely on the FCC to release locked FCC ID's in order to do this. Please note that depending on when reviews are actually completed, there may be a delay during which the grants are generated dependent on the FCC.

[I understand. I have hand delivered parts to the FCC, R. LaForge, and also gave him a copy of the test report upon his request.](#)

For the following information, in effort to treat effectively under short-term confidentiality requested, please answer the following items separately as cited below.

21. Please provide a technical description of operation/function of the FM coupler. Please upload this information as a separate exhibit (operational description) to ensure proper treatment of confidentiality.

[See Response uploaded under short term confidentiality.](#)

22. Regarding the FM coupler, please explain what happens if the XM antenna is directly connected to the docking port and therefore bypasses the coupling module.

[See Response uploaded under short term confidentiality.](#)

Would this yield a leaky coax connection?

Is it possible to bypass the coupling module this way?
Was this mode tested?

IC specific Items:

23. IC – given this device meet power levels for excluded devices in RSS-102, please note that only Annex B needs to be provided on this type of device. See Note 1 of Annex B.

[Resubmitted this information to ATCB web site 10/6/06 with correction.](#)

24. For the IC Form, the current RSS-210 Version is Issue 6.

[Correction made and submitted to ATCB web site 10/6/06.](#)

25. For RX emissions specified on the IC form, the units appear incorrect. Please review/correct.

[Corrections made and part of submission 10/6/06.](#)

26. Emissions designator on the IC form should be F3E not F3H. Please review.

[Correction made and part of submission 10/6/06.](#)

Answers respectfully submitted by Deyo Serrels, Systems Engineer, Delphi Corporation I.I.c.