



Response for Request for information (request sent 10/18/02) for

Re:

FCC ID: L2VAXC550INT

Applicant: Axonn L.L.C.

Correspondence Reference Number: N/A

731 Confirmation Number: N/A

- 1) Please provide information on what the label is made of and how it is permanently affixed to the device.

According to the manufacturer, the label is made of paper but uses a permanent adhesive such that the label would have to be destroyed if an attempt was made to remove it. Additionally the manufacturer has tested the labels through salt, fog, and UV and has not had any problems with adhesion. Acceptability by the FCC of this label has been provided in a separate email.

- 2) Please note that the gain specified in the allowable formula from 97-114 defines that gain as, "G is the numeric gain of the transmitting antenna over an isotropic radiator." This means that the resultant power is EIRP not ERP. Thus, you must use the formula as provided and cannot reduce the level by the dipole gain. The device appears to fail since the properly calculated value appears to be 9.87dBm. Please retest the device to show compliance the required test method and rules stipulated by the FCC. Alternately please explain and justify why you used ERP values. Such justification would require evidence from the FCC that you are allowed to reduce EIRP to ERP or to use a formula using gain referenced to a dipole instead of an isotropic as stipulated in the acceptable test procedure.

You are correct that there is an error in this calculation. From discussing this issue with the manufacturer, they believe that the gain of the TX antenna may be more than the 0 dBi originally specified at very particular positions or angles. The gain provided is based on early investigations that they had performed but which may not have carefully evaluated all "hot" spots. Since the are not currently ready to perform another detailed analysis of this antenna, the manufacture has specified how a direct measurement may be performed. This measurement was made in order to show the EUT is in compliance with the power spectral density requirements. The test report has been updated for this test.