



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

May 20, 2005

RE: FCC ID: LUBRFID001_ATCB002448
Attention: Bob Cole

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that the 731 lists the entire band for the frequencies. Please note that devices under this rule part cannot operate at the band edges. Please also note that as this is not a channelized service, you must list the actual frequencies for the device. Please provide a 731 that lists the proper frequency for this device.
2. FYI - Please note that you have listed a power of 300mW on the 731 form. Please note that this rule part is a field strength measurement.
3. Please list the equipment code for this device on the 731. Generally this would be DXT or DXX for this type device. Please provide the proper equipment code for the 731.
4. Please note that the manual does not contain the appropriate statement required by 15.19(a)(3). The statement in the manual is incomplete and does not contain the 2 warnings involved with this statement. Please note that this is a verbatim statement that is to be used as stated in part 15.19(a)(3). Please provide a manual with this verbatim statement.
5. Please note that the manual does not contain the 15.21 non modification statement where the user is cautioned that unauthorized modifications not approved by the party responsible may void the users authority to use the device. Please provide a manual with this required statement.
6. Please note that the application on the ATCB website indicates that this is also an Industry Canada certification. Please provide either the necessary cross reference paragraphs of RSS210 and the testing performed, or please provide the IC test report.
7. Please note that RSS210 requires that the 20dB bandwidth measurements be made. Please provide the plots and/or data for the 20dB bandwidth for this device.
8. Please note that page one of the report states, "Additionally, EMCE Engineering, Inc. has been approved by the National Institute for Standards and Technology under the NVLAP program (Lab Code 200092-0).) Please note that neither RSS210 nor intentional radiators under 47CFR part 15C appear to be approved standards under your NVLAP accreditation. The above statement from your report would indicate that testing for the intentional radiator portion was done under your NVLAP scope. Please explain.
9. Please note that page 1 of the report references ANSI C63.42001. Please note that this is an incorrect reference as the FCC requires the use of ANSI C63.4 2003. Please correct and verify that all testing was done in accordance with ANSI C62.3 2003.
10. Please note that section 5.1 of the report states that conducted testing for Class B was done from 450 kHz to 30 MHz. Please note testing under 15.107 is required to be from 150 kHz to 30MHz. Please note that test data appears to be from 150 kHz to 30MHz. Please provide proper test data references in accordance with the FCC rules.
11. Please note that in accordance with 15.31(f)(2), for limits of frequencies below 30MHz the extrapolation is 40dB/decade not 20dB as noted in your report on page 30 of the report. This means that for a test distance of 1 meter, the 30 meter limit is increased by $40\log(d1/d2)$ or 60dB not 30dB as mentioned in the report. Please correct the formula to reflect the proper extrapolation and please correct your data to reflect the proper limits based on this extrapolation.
12. Please clearly identify the fundamental operating frequency of this device.
13. Please note that page 33 of the report states the limits used were EN55022. Please note that for intentional radiators spurious emissions are under 15.209. Please correct and compare emissions readings to the correct limit.

Dennis Ward

Dennis Ward

<mailto:dward@AmericanTCB.com>

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.