Review comments

1.
Our RFID reader can as said act in two different modes. Both reading RFID and also as a movement detector. The movement detection function does not require an RFID-tag. It will detect the movement of any object as long as it reflects radio waves.
Some of our customers use the reader for movement detection and also for reading tags in case there is a tag present. The reader is all the time capable of reading both stationary and moving tags. The FDS-function is used to measure the movement speed and to detect objects that are not tagged.
We would like to have our reader approved according to both 15.245 and 15.247

2. The device is intended for both indoor and outdoor use. The exposure calculation has to be updated. See 4. below

3.
a) To comply with FCC 15.247 The device has been tested in ETL Semko Report No 500209R1-1 500209R1-2 and 500209R1-3. The three different devices were tested in the interval 2402 MHz – 2482 MHz

b) To comply with FCC 15.245 The device has been tested in ETL Semko Report No 520634R1-1 520634R1-2 520634R1-3 The three different devices were tested in the interval 2436,17 to 2464,04 MHz

4.
Our intention has been to use up to 500 mW for FCC 15.247 and use up to 75 mW for 15.245. We have the understanding that up to 75 mW can be used according to 15.245. Our idea is that the power can be set in the factory to any power up to these maximum level according to the option selected by customer. The product that is described in the chapter "Electrical data" is set to use just 10 mW.
I would assume that the RF exposure calculation should be based on 500 mW.