



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

July 7, 2003

RE: Siemens Automotive Corporation

FCC ID: M3N-65981411

After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) This device consists of a UHF 315 MHz RX and LF 125 kHz TX/RX. This application is only requesting Certification of the 125 kHz TX (the 125 kHz RX portion does not fall under the scope of Part 15). Note that the 315 MHz UHF RX is considered a separate RX under 15.101 and not part of a transceiver. Therefore this portion of the device must be approved under a DoC or Certification. Please provide further information regarding which authorization is being utilized for the RX.
- 2) Please provide a photograph underneath the shield of the RX.
- 3) The label contains an FCC logo and the phrase "Tested to Comply With FCC Standards". It appears that the device may be subjected to a DoC for the RX (see 1 above). However, please note that to approve a device under a DoC, the RX testing must be performed by an accredited lab (NLAP or A2LA, etc). Please explain.
- 4) Section 5.2 of the test report states that the RBW was usually 1 kHz which contradicts page 6 which states 9 kHz. According to ANSI C63.4, the RBW in this range should be greater than or equal to 100 Hz for 9 kHz to 150 kHz and 9 kHz for 150 kHz to 30 MHz. Please provide further information regarding use of the RBW to ensure that accurate amplitude readings were taken.
- 5) The ASK modulation does not necessarily look Manchester encoded. Additionally, because this is actually ASK modulation and not OOK, a 50% duty cycle assumption may not be correct since there is no guarantee the data bit length is 50%. Please provide further information regarding the modulation and duty cycle.
- 6) According to the bandwidth measured, it appears that part of the bandwidth falls in the 90 – 110 kHz restricted band. Note that the FCC considers all emissions within 26 dB of the fundamental to be modulation products and are therefore part of the fundamental. Therefore all emissions that fall in the restricted band must be < 26 dB below the fundamental, regardless of the power level at the fundamental.

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Examining Engineer

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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.