

May 27, 2008

RE: ATCB006340 – Class II Permissive Change / IC Existing Family

FCC ID: M3N5WY7977 & IC: 267F-5WY7977

The following is in response to the comments made on the above referenced application.

1. The FCC ID number shown on the submitted label exhibit is wrong. There is a dash (-) between the Grantee Code and the product identifier portion of the FCC ID number. This dash is not shown on any other exhibits. Please submit a new FCC ID label exhibit.

The FCC ID number on the label exhibit was correct. However, there was a typographical error in our database. This typographical error has been corrected and revised documents uploaded.

2. The FCC ID number shown on the product label for the 315 MHz receiver does not exist. Please provide a new label with the correct FCC ID for the 315 MHz receiver on it.

The manufacturer's supplied label was in error, mistakenly employing an FCC ID number for the DoC receiver. They have corrected the mistake and now properly show only the FCC logo and IC number for said receiver.

3. Please explain the use of the FCC logo for Declaration of Conformity (DoC) on this device. The 125 kHz receiver is below the frequency range of DoC for a receiver (30 MHz to 960 MHz). This vehicle-mounted device is exempt from the digital device requirements (Section 15.103). The 315 MHz receiver has an FCC ID number associated with it (presuming it is corrected, see item 2 above). I cannot see any other reason for the DoC logo.

As noted above, the RF receiver is DoC and does not employ an FCC ID number.

4. Based on the operational description and the block diagram exhibits, Section III - 7(b) of the FCC application form should be checked yes (instead of no) and Section III – 8(b) should be filled out with the appropriate FCC ID number. Both the block and operational description refer to another device that requires a separate authorization (of Certification I assume). Please address this discrepancy.

According to the manufacturer, the active LF transmitter depicted in the block diagram is subject to its own certification and is not dependant on the current certification. Likewise, the current LF system is not dependant on the certification of the active LF transmitter depicted in the block diagram. While the two devices share buffered data, they are entirely separate devices and are manufactured such that they may be operated independently. Each has its own frequency generating circuitry.

5. For Your Information – The address on the FCC application form does not match the address for Continental Automotive Systems on the FCC Grantee Code database. ATCB cannot change the FCC Database address to match what is on the FCC application form. When we select Grantee Code M3N, the FCC database automatically fills out the address and contact information for Continental Automotive Systems on the grant. If you want the address that appears on the submitted application form to appear on the grant for this device, you must have it changed in the FCC Grantee Code database first. Otherwise the grant will be issued with the address listed in the database: 2400 Executive Hills Drive, Auburn Hills, MI 48326.

The FCC Filing Form has been corrected to show the address in the FCC Database.