



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

November 9, 2005

RE: Graco Children's Products, Inc.

FCC ID: M6YA3929A3930

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

- 1) The 731 form cites an equipment code of DXX. This device appears to be a DTS device. Please adjust the 731 form.
- 2) Please provide a separate block diagram for this device that is in compliance with 2.1033(b)(5). The block diagram should show the frequencies of all oscillators in the TX portion of the device as required by Part 2.
- 3) If necessary, please update the confidentiality letter to include block diagrams.
- 4) Please provide an operational description for this device as a separate exhibit.
- 5) Please provide a separate MPE RF exposure exhibit as well.
- 6) Please provide a separate test configuration photograph exhibit as well.
- 7) The users manual appears to be missing information regarding separation distance from users and also prohibition against co-location requirement. Please update the manual to include the following or similar:

The antenna used for this transmitter must be installed to provide a separation distance of at least 20 cm from all persons and must not be co-located or operating in conjunction with any other antenna or transmitter.

- 8) Average measurements appear to be provided. Information provided explains the packets as being 133.33 uSec long followed by 33.33 uSec pause. We are assuming that the transmitter behaved in this manner during testing. Therefore these emissions are considered pulsed emissions and must meet with pulsed requirements. The VBW used must be $> 1/T_{on}$ time which in this case requires > 7.5 kHz. Average measurements must be made using this VBW or greater. However an additional correction factor of $20 \log (0.13333/(0.13333+.03333)) = -1.94$ dB can be applied. Average measurements made with a 10 Hz RBW would not be applicable. Note that if the device was in continuous transmissions without pauses during the testing, the above may not apply. Please review and correct as necessary.
- 9) Measurements > 1 GHz for unintentional emissions must provide both peak and average emissions, not just average emissions. Please correct.
- 10) Please provide plots of the 6 dB bandwidth. Please ensure that $RBW = 100$ kHz, $VBW \geq RBW$.
- 11) Please provide plots of the PDS test. Additionally, given the pulsing nature of the device, it would be preferred to use the method where $RBW = 3$ kHz, $VBW > RBW$, and sweep of $span/3$ kHz. You can determine the highest point in the emission and then zoom in strictly on that area as necessary using the above settings.
- 12) FYI...Further review will be necessary once the above items are provided.
- 13) FYI...For the RX portion subject to a DoC, the users manual should contain all the following information on a single page. This information does not appear to be provided together in the manual as specified by 2.1077.

COMPLIANCE INFORMATION (47CFR 2.1077)

If a product is tested and authorized under a Declaration of Conformity, a compliance information statement shall be supplied with the product at the time of marketing or importation, containing the following information on a single page:

- (1) Identification of the product, i.e. name and model number.
- (2) A statement similar to that contained in Section 15.19(a)(3) that the product complies with Part 15 of the regulations.
- (3) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.

IC issues:

14) Please provide occupied bandwidth measurements for IC.



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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.