

Clarification of the frequency range to be listed on f-731 for MHATRUTRX

The issue references KDB pub 634817 and the guidance it provides. That document states the following:

- “3. List the center frequency of the lowest channel to the center frequency of the highest channel for the following operation modes which result in worst case RF characteristics:
- a. the widest frequency range
 - b. the highest power “

There seems to be some ambiguity in the language as written in the KDB since the center frequency of the lowest channel and the center frequency of the highest channel may not necessarily meet the criteria of both points a and b, i.e., the frequencies for the widest frequency range may not coincide with the frequencies for highest power. One could take the position the intent was to decouple points a and b and list the widest frequency range and then determine which channel produced the highest power and list that power. Therein is the ambiguity as to what was intended.

The subject equipment was tested on a low channel center frequency of 909.312 MHz and a high channel center frequency of 920.358 MHz. The actual tunable low channel center frequency is 909.009 MHz and the actual tunable high channel center frequency is 920.841 MHz. Based on the KDB the latter listing are the frequencies that should be listed on the f-731, i.e., 909.009 MHz and 920.841 MHz, since they are the lowest and highest channel center frequencies based on point a above.

The language in Part 15 section 15.31(m) states that devices with an operational range over 10 MHz should be tested on 3 frequencies, one near the top, one near the middle and one near the bottom. This requirement is fully met. It does not require testing on the absolute lowest and highest channels the device tunes too. Further, listing the actual low channel center frequency (909.009) and the high channel center frequency (920.841) on the form f-731 will make the issued grant and application fully conform to the KDB requirements and Section 15.31(m) of the FCC rules.

Based on the above, Data Sciences, request that the f-731 list the frequency range of 909.009 and 920.841MHz on the f-731.

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