RE: Sato Corporation
FCC ID: MMFM8485SE

In response to your questions regarding the above application:

1) Please provide a external photograph exhibit of sufficient detail to show the outside of the device being approved.

Additional photographs have been uploaded to the ATCB website.

2) Part of the internal photographs was uploaded as confidential. Note that internal photographs are not typically allowed to be considered confidential. Additionally, the confidentiality letter did not appear to ask for confidentiality on this. Please explain or provide further detail as necessary.

Please remove the confidentiality request for internal photographs.

3) The device is labeled with a DoC mark consistent with Class B PC peripherals. Additionally, the users manual page 2 mentions Class B. However, the device cautions against using in a residential environment because it may cause interference. It appears that the Class A users manual statements were placed in the users manual, except they were labeled with Class B. Is this Class A or Class B. This will affect the labeling of the device and statements required in the users manual. Please explain and correct all necessary exhibits.

The user manual has been updated to contain the FCC Class B warning:

NOTE: This equipment has been tested and found to comply with the limits for a Class B digital device , pursuant to Part 15 of the FCC Rules. These limits are designed to provide reasonable protection against harmful interference in a residential installation. This equipment generates, uses, and can radiate radio frequency energy and, if not installed and used in accordance with the instructions, may cause harmful interference to radio communications. However, there is no guarantee that interference will not occur in a particular installation. If this equipment does cause harmful interference to radio or television reception, which can be determined by turning the equipment off and on, the user is encouraged to try and correct the interference by one or more of the following measures:
— Reorient or locate the receiving antenna.
— Increase the separation between the equipment and receiver.
— Connect the equipment into an outlet on a circuit different from that to which the receiver is connected.
— Consult the dealer or an experienced radio/TV technician for help.

4) Application for FCC ID: MMFCL4XXE appears to use the same module as this application, however there appears to be difference of conducted power between the 2 application. Please explain.

The two devices use the same module. The output power setting is different for the two different devices.

5) The RF exposure information in the users manual appears to be missing the prohibition against co-location statements that are required as well.

The statement has been added to the user's manual and the revised manual has been uploaded to the ATCB website.

6) Please explain how average measurements were made. It is assumed that the device was in a 100% CW carrier for purposes of the test. However a large difference exists between peak and average measurements which suggests otherwise. Since this device has a narrow bandwidth it would be expected that the adjustment of the VBW would normally not show much difference. Note that calculations based upon worse case dwell time per frequency are typically used to correct for average measurements. Note that calculations of the timing diagrams provided would also suggest that a VBW of > 100 Hz or more would be necessary for any average measurements made should the device be OOK modulation during the test.

> The spurious signals above 1GHz were narrowband, and could be observed with a reduced resolution bandwidth (30kHz). When making the FCC measurement, with RBW = 1 MHz, the signals from the EUT were below the instrumentation noise floor. All of the measurements, as indicated in the test data, were of the noise floor, hence the difference between peak and average measurements.

7) FYI…...Average time of occupancy according the Part 15.247 for 902-928 MHz with > 250 kHz hopping channel is based on 10 seconds, not 20 seconds.

> Noted. Thank you.

8) FYI…..The DoC in the users manual must show a United States responsible party according to 2.1077

> The DoC now references a US address.

This letter, along with the following documents (uploaded to the ATCB website) should answer these outstanding issues:

> External Photos #2.pdf
> M8485Se_QuickGuide-1

Regards,

Mark Briggs