



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

March 12, 2006

RE: SATO Corporation

FCC ID: MMFRWMTM1

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

FCC Review

- 1) Recent information from the FCC has stated that the confidentiality letter must be signed by the contact of the grantee given on the FCC site, or by the laboratory if the lab has been given authority to do so. Please note that currently the confidentiality letter comes from the manufacturer only, not the applicant or lab. Please correct.
- 2) The device appears large enough that the labeling should include the 2 part statement on the label. Note this information may alternatively be placed in the manual if the device is smaller than 8x10 cm. Please correct.

This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation

- 3) It appears that this device consists of 2 boards and the label is actually placed on the digital board and not the TX board. Ideally the label should be placed upon the host, or in this case the TX board. Please consider relocating the label.
- 4) Information received by emails suggests your client may not want to receive the grant until March 15. Please kindly confirm.
- 5) The 731 form cites a DTS device. However this device appears to be submitted as a DSS device. Please review and/or correct the 731.
- 6) Please provide photographs/description of the antennas approved for use with this device. Please include photos, manufacturers, gains, etc.
- 7) Users manual appears to be missing information required by 15.21, 15.105, non-colocation requirements, and other detailed information that should be provided to the integrator regarding modular approval. Please see example information (attached) that covers various items that should be discussed or covered in the manual.
- 8) Manual suggests user definable power up to 30 dBm. Please note that FCC expects device to be tested as worst case power output. It appears that this may not have been done. Please review. Additionally, please note that allowing user to adjust power above approved levels is also not allowed per 15.15.
- 9) Page 3 of the test report cites a 200 kHz spacing, while data suggests something different (470 kHz). Please review.
- 10) DSS devices should include information on the following items:
 - a) pseudo random sample hopping list and how the pseudo random channels are selected.
 - b) description of system receivers and how they have input bandwidths that match the hopping channel bandwidths of their corresponding transmitters and how they shift frequencies in synchronization with the transmitted signals
 - c) How the device meets 15.247(g) and (h).
 - d) If the system has different modes of operation that affect the above, the theory should cover each of these as well (i.e. different timing, data rates, etc).
 - e) What is the return frequency from tags.

A handwritten signature in black ink, appearing to read "Timothy R. Johnson", is positioned above the printed name.

Timothy R. Johnson
Examining Engineer

[mailto: tjohnson@AmericanTCB.com](mailto:tjohnson@AmericanTCB.com)

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.