

October 29, 2008

RE: Schrader Electronics Limited

FCC ID: MRXC4N3MF9

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

1) FYI...New policies by the FCC now require ATCB to submit "Permit But Ask" (PBA) Inquires to the FCC regarding confidentiality on exhibits that are not normally held confidential for them to allow us to grant confidentiality to the exhibit requested. Additionally please note that there are usually additional fees associated with these Permit But Ask inquiries. We have gone ahead and submitted this inquiry to the FCC for this case, however please note further information may be required at the FCC's request.

Understood. However, please note that until such a procedure is streamlined it will be impractical for us to employ your expedited review option on such devices.

2) Please note that REL listings themselves may be delayed by IC. IC is requesting that a Canadian Representative letter be provided to help ensure timely REL listing for the future. This letter is simply an acknowledgement by the Canadian Rep that they understand their responsibility. (See RSP-100 section 3.4 for responsibilities).

In the case where a company has a branch office in Canada, this is not a concern. However, the majority of our lab customers do not have an employee in Canada. Companies that sell/use the associated products in Canada are generally unwilling to sign a document attesting to responsibilities for a foreign entity. We have requested that letters be provided by our clients, but none as of yet have been able to convince their customers to sign a document.

3) Regarding timing plots, the plot on bottom of page 10 appears to show 9.375 ms. However due to the nature of middle plot on page 9, it appears some dynamic range is missing on the first pulse. Assuming such an error exists on page 10, this could affect duty cycle. Please comment/review.

The decreased first pulse amplitude in the first plot on page 10 is because the unit must be shaken to simulate tire roll. The signal received by the SA varies because of changing orientation and because my hand gets tired. This appears to be the only "dynamic range" issue. As per the video trigger delay in the spectrum analyzer (~0.25 ms at 50 ms sweep rate), this is compensated for by measuring the pulse width from peak to the noise floor (rather than 20 dBc). No error in duty factor is apparent.

4) It is uncertain if 30*duration of TX requirement is met for appropriate conditions when device repeats every 15 seconds according to operational description.

The middle figure on page 10 shows a single FSK transmission as used in this mode (3 words in < 325 ms). $30 \times 325 \text{ ms} = 9.75 \text{ seconds} < 15 \text{ ms}$.

5) Please explain alarm mode in more detail. Currently it almost appears that when pressure is measured, this equates to an alarm mode given the operational description provided.

“Pressure measure mode” is entered when a significant change in tire pressure is observed in a short period of time. The information in the following response should clarify.

6) Do alarms TX only for the duration of the alarm? What defines an alarm condition?

“Pressure measure mode” is entered from Drive mode when the DUT detects a 1->2 psi change in tire pressure between 5 second pressure samples. If the acceleration is less than 5g’s then two transmissions spaced 22 seconds apart are employed to warn the user/vehicle. If acceleration is > 5g’s, then continuous repeating transmissions of tire pressure information are sent every 15 seconds while the vehicle is in motion.