

**Third TCB interaction:**

Dear Jon,

Gemtek has another model currently pending for FCC certification by a another local test firm. The FCC ID (MXF-WX-15XX) was requested for that, but somehow the local test firm made wrong key in, and therefore using FCC ID MXF-WX1500.

We would appreciate you change FCC ID from MXF-WX-1500 to MXF-WX1501 for current application.

Attached files are the documents you requested: form 731, WX-1501 label and statement letter. Thanks for your kind help!

We trust this is satisfactory and look forward to your reply.

Best regards,

Derick  
Nmi Niekerk NL

Dear Mr. Chen,

MXF-WX1520

Attached please find the grant for the MXF-WX1520. The original will follow by surface mail.

MXF-WX1500

As you may be aware I am also processing your application made through NMI for the MXF-WX1500. Unfortunately that FCC ID has already been filed in the FCC database as a pending application, apparently through another test firm. I was going to issue you a grant for that application today along with the one attached but now I cannot do that as the FCC computer will not allow me to file under that ID. FCC IDs must be unique.

In order to proceed and give you your grant for this unit, you will need to select another FCC ID and to submit to me new copies of the Form 731, a new label, and a letter stating that the unit associated with the new FCC ID is identical with the unit previously associated with the FCC ID MXF-WX1500 (this allows me to use the other portions of the old application). I will then issue you a grant for the unit under your new FCC ID.

Sincerely,

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Jon D. Curtis  
Certification Manager

**Second TCB interaction:**

Hello Jon,

Please find attached the label info for Gemtek models WX-1500 and WX1520 in MSWord format.

I hope this will be sufficient for issueing the FCC grants.

Thanks, best regards and looking forward to your response,

Derick  
Nmi Niekerk NL

Hi,

Hope you are having a relaxing vacation. I apologize for disturbing it with my questions.

I have reviewed the issues on your response and I find that it settles all but one of the outstanding issues.

The label must have the required statements added to it. The "practicable"-ness of the label relates only to it's use. An example of a "practicable" exemption would be for an inplantible device, like a pacemaker, where the complications involved in making such a label would increase the likelihood of infection. Also parts which must go into extreme environments such that a label would be burnt off. This device sits on a desk. It is very "practicable" to put a label on it. In fact you have said you would, we are just arguing over what to put on that label.

Your only hope of putting the statement in the manual is to prove that it is "small". In the past the FCC has been somewhat variable in their enforcement of the definition of "small". Now they have standardized on smaller than a man's palm. I can hear you laughing! That is currently the definition that I am stuck with. Luckily I have big hands. But even my hands are smaller than this device. It measures 136mmX126mm and it seems to me that there is a considerable white space are on the label. As I see it you have two choices:

1. Put the statements on the product's label.

OR

2. Ask me to ask the FCC for an interpretation (or ask Ray at rlaforge@fcc.gov yourself) as to if a product of 136mm by 126mm can take the "small" exemption. A word of caution: they may take a while to respond to either your or my question. I expect that they will say No, but I don't mind asking. If they respond yes, I will of course grant the application.

Sincerely,

Jon.

**First TCB interaction:**

Dear mr. Jon Curtis,  
Please find our response in Response:".." below on your comments.  
Thanks and looking forward to your reply.

Best regards,  
Derick Sariredjo  
NMI Niekerk NL

Certification Manager <certification@curtis-straus.com> on 08/16/2000 03:58:14 PM

To: Derick Sariredjo/Nmi  
cc:

Subject: MXF-WX1500

Dear Derick,

Thank you for your business. I appreciate that you were able to make the 731 form fit on our strange size US paper.

We have the following issues to resolve to

grant the Gemtek MXF-WX1500 application.

FCC ID: MXF-WX1500

1. The manual indicates that 11 channels are available in the US, 13 in Europe, and 14 in Japan. How is the US user blocked from setting the device to channels 12-14? I assume 12-14 are at higher frequencies outside of the allowed FCC band. Since this is a consumer type device, the user cannot be able to set the device to these channels. It is not permissible to simply warn the user, they must be unable to set the device with the software or hardware provided.

Response: This is controlled by final firmware. Products with FCC mark will be set only 11 channels available for user.

2. The device is too large to claim the small size exemption to the labeling requirements of 15.19 (a) (3). Please add the statement to the label.

Response: Manufacturer chooses to act according to 15.19(a)(5), the statement doesn't have to show on label if there is no "practicable" place for that. This statement will be part of manual like WL-211P does.

3. The manual must caution against user modifications as required by 15.21. Please put the 15.105 (b) information to the user in the manual. My last email had attached a Gemtek manual from an earlier submission which showed this language.

Response: Please find revised manual attached

4. I do not see data responsive to the voltage variation requirements of 15.31(e). I see a power input port in the photos. It would appear that you need to provide data to show the amplitude effects of voltage variation at this port from 85% to 115% of nominal.

Response: Please find additional testdata in report addendum 1 attached.

5. The RF exposure information provided only addresses a separation distance of 20 cm. The manual warns users to stay 4.5cm from the device. One or the other of these documents needs to change.

Response: Please find revised manual attached

6. The bandwidth plots only address the 11mbs mode of operation. Why are there no plots for 2mps? The specification is for a minimum bandwidth of 500kHz. Are they the same? Or is 2mps smaller?

Response: Please find additional testdata in report addendum 1 attached.

7. Please tell us the frequency range of radiated emissions measurements investigated.

Response: Investigated frequency range from 9kHz to 26.5 GHz

8. You will need to prove compliance to 15.205 restricted bands limits. The 2.4GHz band of operation is bracketed by two restricted bands. One ends at 2390 MHz, the other starts at 2483.5 MHz. The limit in these bands is 500uV/m when measured with an average detector and 5000uV/m when measured with a peak detector. I note from page 28 of the test report that there appears to be an conducted emission spike just at 2390MHz. Note that the limit is a FIELD STRENGTH limit and I need field strength test data to show compliance.

Response: Please find additional testdata in report addendum 1 attached.(See attached file: WX-1500 user manual rev1.2 2.doc)(See attached file: 10119951R01 WX1500\_FCCrep\_add1.pdf)

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Jon D. Curtis  
Certification Manager

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