

## **SECOND RESPONSE:**

From the TCB:

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.

Client response: Statement added to the label.

## **FIRST REPONSE:**

Dear mr. Jon Curtis,

Please find our response in Response:".." below on your comments.

Can you also send/fax me a copy of the credit card sale slips of these three

Gemtek applications so my secretary can process them.

I'll still be on vacation for the next two weeks, but read my email daily and will try to respond a.s.a.p. to any further questions.

Thanks and looking forward to your reply.

Best regards,  
Derick Sariredjo  
NMI Niekerk NL

Certification Manager <certification@curtis-straus.com> on 08/16/2000 04:34:15 PM

To: Derick Sariredjo/NMI  
cc:

Subject: MXF-WX1520

Dear Derick,

This one is virtually identical to the MXF-WX1500. Apparently you even reused some of the conducted test data as only the housing changes.

We have the following issues to resolve to grant the Gemtek MXF-WX1520 application.

FCC ID: MXF-WX1520

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: Manufacturerer 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 refer to revised manual attached to WX-1500 email

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 refer to revised manual attached to WX-1500 email, 20cm is included.

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.

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