



American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

April 26, 2002

RE: FCC ID: NPI43448

I have a few comments on this Application. Please note that this device is not compliant with the FCC rules. See item 6 below for explanation.

- 1 The internal photos are not complete. There are two devices on either side of the main board that have PC boards in them. Please remove the covers on these devices and take photos of the circuit boards (both top and bottom). Also, please show the inside of the main housing in relation to the other components. x
- 2 There appears to be an antenna in the external photo, yet this does not appear in the internal photos. Please show this antenna as it is connected to the internal circuit boards. x
- 3 The label appears to be sufficiently large enough to contain the two condition statement. Please explain why this statement is not on the label. Please use the label specifications described in 15.19 (All other devices shall bear the following statement in a conspicuous location ON THE DEVICE: "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." Only when the device is too small can this statement be placed in the manual. Please note, this device nor the label is too small. Consequently, this statement should appear on the label on the device. x
- 4 The report uses conflicting technical information. Report Section 3.1 states the device a single channel device is operating at 27.128MHz. Report Section 3.2 and the manual state the device is a 10 mw single channel device operating at 27.145 MHz. The 731 and the schematics indicate that the device operates at 27.145MHz. The schematic also indicates there is a multiple channel switch capability. Please correct the conflicting information between the report and schematic. Please note that the reference to Also, if this device uses multiple channel frequencies please state what those frequencies are. x
- 5 The report states that measurements below 30 MHz was done in according to 8.2.3 of ANSI C63.4. Please note that 8.2.3 is for measurements ABOVE 30 MHz, not below. Also, please note that the FCC does not accept clause 8.2.2 use of a rod antenna. It is FCC policy to require that measurements below 30 MHz be done with a loop antenna. x
- 6 For intentional radiators 15.209 states, "...the level of any unwanted emissions shall not exceed the level of the fundamental frequency." Please note that on pages 6 & 9 of the report 624.3 MHz exceeds the level of the fundamental by more than 7dB. This device is therefore not compliant with the intentional radiator rules. Please re-measure and/or correct the device to be in compliance. xx
- 7 Please note that your statement in section 5.3.1 is incorrect. While 15.33 states that intentional radiators are to be tested to AT LEAST the tenth harmonic, 15.33 also states, "If the intentional radiator contains a digital device, regardless of whether this digital device controls the functions of the intentional radiator or the digital device is used for additional control or function purposes other than to enable the operation of the intentional radiator, the frequency range shall be investigated up to the range specified in paragraphs (a)(1) through (a)(3) of this section or the range applicable to the digital device, as shown in paragraph (b)(1) of this section, whichever is the higher frequency range of investigation." Please correct this statement. x

- 8 Please note that the FCC requires the entire manual that will be provided to the end user to be provided as part of an application. Please provide the full manual for review. x manual too large.
- 9 Your manual insert states the device is a Part 15 Class A. Please note that since this is a 'game' or toy device and since no other evidence to the contrary indicates its use outside of a home environment, the FCC views this as a class B digital device for use in the home environment. As such, the information to the user specified in 15.105 must be placed in the manual. x



Dennis Ward

<mailto:dward@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.