



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

December 10, 2007

RE: FCC ID: O2E-ILR-IM2\_ATCB005727

Attention: Kathy Grzovic

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that the 731 states the device operates at 125kHz under 15.209, and the block diagram only shows a BT module. The operational description indicates that the 125kHz transmitter is inside the micro processor, but there is no indication of this on the block diagram. Please either point to the transmitter on the block diagram or please provide a block diagram for the 125kHz transmitter.
2. Please note that the report states the testing is to 'FCC Rules Part 15.209: Frequency Hopping, Direct Spread Spectrum and Hybrid Systems that are in operation within the bands of 902-928 MHz, 2400-2483.5 MHz and 5725-5850 MHz'. Please note that 15.209 is not FHSS, Direct Sequence SS or hybrid in the ranges mentioned but is the general limits section of Part 15. Please correct the report to show compliance to the proper rule sections and please properly describe the rules under which you are seeking certification.
3. Please clarify if the BT module has its own certification and the device label has "contains FCC ID:xxxxx" for the BT module. If this is the case then there should be no issues. However, if the BT device does not have its own ID or if the applicant is seeking to include the BT module under this ID, then test data must be provided for the BT transmitter. Also, if the later is the case you cannot have one model with the BT and one without. That would require 2 separate ID numbers.
4. FYI – 15.207 limits are not CISPR B limits and reference to CISPR B should not be made for intentional radiators.
5. FYI - Please note that for RSS210 section 2.6 states "Devices operating below 490 kHz all of whose emissions are at least 40 dB below the limit given in Table 3 are Category II devices subject to RSS-310." Please note that if the emissions were to be taken at three distances and the limit extrapolated to 300 meters it is obvious that the end result would be the device would be more than 40dB below the limit and the device would be a Class II IC device subject to RSS310.. Has this been considered?
6. Please note that the test setup photos show only the configuration using the Bicon. Frequencies below are tested using a loop antenna. Please note that while the test report states a loop was used, the setup photos do not agree. Please confirm the tests were done using a loop antenna.

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.