

1. The FCC ID number on the application form (ONFT70TX-08ER8) does not match the FCC ID number on the rest of the exhibits in this application (ONFT70TX-08ERB). Also the equipment code shown in Section III, item 4(a) (DXX) is incorrect. The equipment code for a 15.231 transmitter is DSC (for a transmitter) or DSR (for a transceiver). Since this device does not have a receiver, it should be DSC. Please provide a corrected FCC application form as noted above.

SGS: Sorry to make a mistake. The ID number and equipment code have been revised. Please find the second revised Form 731 for your reference.

2. The IC number shown on the confidentiality request for IC is not correct. The company number 4807A should be separated from the universal product number (UPN) by a dash (-) not an underline (_). Please provide a corrected IC confidentiality request letter.

SGS: The IC number has been revised to 4807A-T70TX08ERB. Please find the revised IC application form for your reference.

3. There are two problems with the required statement from Section 15.29(a)(3) of the FCC Rules. First, this two part statement must be on devices larger than 8 by 10 cm as stated in your test report, not in the user manual as shown. The user manual for this device states that this device is 9.5 by 18.5 cm is size. Therefore this device is larger than the size permitted to place this statement in the manual. Please provide an equipment label that shows this required statement from 15.19(a)(3) of the FCC Rules on the device itself.

4. The second problem with the required statement from Section 15.19(a)(3) of the FCC Rules is this statement is not verbatim or exactly as it appears in the Rules. Please provide an equipment label that shows the following required statement on the device itself - "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."

Comment-3

In response to the attached request from ATCB to allow placement of the compliance statement from Section 15.19(a)(3) of the FCC Rules under the protective cover of the transmitter case, the FCC has asked for a user manual that documents that the protective cover is removable (See document entitled "KDB 445580 Response.pdf"). The submitted user manual does not show that this cover is removable. Please submit a new user manual that documents that the protective cover is removable from the transmitter case. I will forward this new user manual to the FCC with the hope that they will accept placement of the compliance statement under the protective cover on the transmitter case.

SGS: Regarding the label, the statement of 15.29(a)(3) has been stuck on the product and the relative indication has been recruited to user manual. Please find the revised label location and the last page of user manual for reference.

5. The duty factor for this transmitter appears to have been calculated incorrectly. My observations of the plot provided on page 12 of 27 of the FCC test report indicate that the pulse train repeats every 45.8 seconds (approximately). The first train starts at extreme left of the plot at 3 milliseconds mark and ends at approximately the 48 millisecond mark on the plot. Using 48 milliseconds as the second pulse train start point, I believe the next pulse trains ends at the 97 millisecond mark on this plot. Therefore the denominator in calculating the duty factor should be 45.8 milliseconds not 100 milliseconds. I also note that there are no pulse lengths shown on the plot on page 12 of 27 that last 4.209, 2.405, 3.006, 1.403 and 1.002 milliseconds as used in calculating the duty factor for this transmitter. I believe you are trying to provide too much information in one zero span plot. You must separate this information into several plots to clearly support the duty factor calculations shown. Please provide evidence in more zero span plots to support the submitted duty cycle calculations.

[SGS: Test report has been revised as above instruction. Please review the revised IC test report and ID test report.](#)

6. The FCC address shown on the application form does not match the information on the FCC Grantee Code database (See attachment entitled “_FCC Grantee Search Result.pdf.”) I cannot control what address appears on the FCC grant because this information is prefilled from the Grantee Code database. When I enter the Grantee Code ONF in the application form, the FCC automatically fills out the applicant address from what is in the database. This means that the grant for this device will be issued with the address of Datavagan 21, Goteborg, Sweden on the grant. If you don't want this address on the grant, please contact the FCC to have the Grantee Code database corrected. Alternatively you can contact Ms. Marianne Bosley of ATCB by email at Marianne@atcv.com for help in getting the database corrected.

[SGS: Have updated.](#)

7. The IC address shown on the application form does not match the information on the IC database (See attachment entitled “_IC Company Name Search.pdf.”) I will be issuing the IC certificate with the address that appears on the IC database. This means that the address will be Datavagan 21, Goteborg, Sweden on the IC certificate. If you don't want this address on the certificate, please contact IC to have their database corrected. Alternatively you can contact Ms. Marianne Bosley of ATCB by email at Marianne@atcv.com for help in getting the database corrected.

[SGS: Have updated.](#)

8. The IC application needs the following corrections”

- (a) The emission designator should be 32K0L1D or 32K0K1D not what is shown,
- (b) The transmitter spurious worst case should be 49.45 dBuV/m @ 3m instead of 35.12, and
- (c) The receiver spurious worst case should be blank since this device does not contain a receiver.

[SGS: 32K0L1D is correct. And we have revised transmitter spurious worst case and receiver spurious worst case as you mention.](#)