

Good morning / afternoon

Below is our response to your recent review of the documentation that has been submitted

----- Original Message -----

From: oetech@fccsun27w.fcc.gov

To: auklab@ihug.co.nz

Sent: Friday, November 16, 2012 11:19 AM

Subject: FCC Equipment Authorization System

To: f-731 Test Firm; Applicant

1) Concerning 90.210(d)(4), fyi the cross-reference to 90.210(m) is a legacy rulemaking erratum (i.e., dockets 00-32, 92-235).

For equipment authorization purposes, the correct text for 90.210(d)(4) is taken to be: "For emissions beyond 50 kHz from the edge of the authorized bandwidth, see paragraph (o) (i.e., "Instrumentation") of this section."

Please adjust op. desc. and/or test report exhibits as applicable.

The resolution bandwidth used to define the Mask D reference level in the EMC Technologies test report has been amended from 30 kHz to 120 kHz

This was a typographical error

A revised test report has been uploaded

In addition the operational description has been revised by the client with the original pre compliance testing results having been removed.

2) We note MPE estimation and user manual apparently show generic RF exposure compliance distance (1 m) based on Occupational/Controlled limits.

Appropriate RF exposure training information and device labelling are generally required for a device to qualify for applying Occup. limits; see KDB pub 447498 D01 v05 at minimum items 3. 5), 4.1. 5), 7.; also KDB pub 865664 D02; also e.g. TIA TSB-133.

In lieu of the preceding Occup. qualifications, applications should address compliance under Uncontrolled/Gen. Pop. conditions; see applicable portions of KDB pubs. 447498, 865664.

Please update relevant exhibits as applicable.

The MPE calculations in the EMC Technologies test report have been revised with calculations being made to the General Public limits only

The safe distance in the User Manual has been revised accordingly and uploaded

3) Per 15.101(b), the receiver portion/function shall be authorized under the verification procedure. For reference we note that receiver test data herein is not applicable for 2.1033, 2.915, 2.911(b), 2.907, and 15.101 purposes.

Receiver measurements made to FCC part 15 have been removed from the FCC Part 90 test report and have been reported to the client in a separate FCC part 15 test report for verification purposes

4) Please provide additional supporting information / explanation for how the equipment complies with, or is not subject to, the 90.203(j)(4)(iii) requirement to be capable of operating on channels of 6.25 kHz or less; and (alongside) the 90.203(j)(4)(iv) requirement.

An explanation from my client has been uploaded which addresses this issue along with the data sheet for the data modem.

The data sheet and explanation from the client shows that the radio can operate with data rates from 4800 bps on channels with spacing of 6.25 kHz and up to 19200 bps with channel spacing of 25 kHz

5) Further to 90.212(b), 90.207(l), etc., as we understand the device does not support digital voice operations; thus we note digital voice will not be authorized under this application.

This transmitter is for data operations only

The transmitter does not support digital voice operations

The test report, operational description and user have all been checked to make sure that there is no mention of digital voice operations and no mention can be located

Grantee code update

A few months ago I changed the contact details of my clients grantee code (P5M)

I then attempted to change the company name from RF Innovations PTY Ltd to STI Engineering

I entered the details and the website said that the changes would be made by the FCC

No changes seem to have been made

I have also uploaded the change of company name details for the grantee code P5M which I hope you will be able to update for me

regards

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