Exhibit B: Compliance Summary

FCC ID: P6I-COPYCAM

Revision 01/31/02

Information about the Client

Company Name:	Polyvision Corp.
Address:	14523 SW Millikan Way Ste. 130
City, State, Zip:	Beaverton, OR, 97005
Requested By:	Guy Williams
Job Number:	POLV0012/HYPE0001

Equipment Under Test (EUT)

EUT Model Number or Product Name:	CopyCam
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Discussion

The Applicant is using a MITSUMI ELECTRIC CO., LTD, Bluetooth Module, Model No. WML-C05 XX, FCC ID: POOWML-C05, as the transmitter for this application. The module as it is used in this "CopyCam" application uses a different antenna and lower power setting than was used for the original approval of the module. That lower power setting is a result of the Polyvision software implementation, no other changes were made to the module. Therefore, a new grant is being attained for this product. Due to the similarities with the original module approval, and the fact that no physical changes were made to the module, only those tests that could be affected were repeated. Specifically, the information provided for the original module application for the processing gain and the RF exposure justification was used.

Opinion

20 dB Bandwidth

Specification Requirements	Description	Comments/Deviations
15.247	20 dB Bandwidth	

Opinion: The Equipment meets the intent specified by the requirements listed above.

Discussion: The Applicant has submitted test results in the form of a test report.

Reference: Northwest EMC Test Report No. POLV0012. (File Name: Exhibit R Occupied Bandwidth)

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Band-edge Compliance

Specification Requirements	Description	Comments/Deviations
15.247	Band-edge compliance of RF conducted emissions.	

Opinion: The Equipment meets the intent specified by the requirements listed above.

Discussion: The Applicant has submitted test results in the form of a test report

Reference: Northwest EMC Test Report No. POLV0012. (File Name: Exhibit S Band Edge Compliance)

Carrier Frequency Separation

Specification Requirements	Description	Comments/Deviations
15.247	Carrier Frequency Separation.	

Opinion: The Equipment meets the intent specified by the requirements listed above.

Discussion: The Applicant has submitted test results in the form of a test report

Reference: Northwest EMC Test Report No. POLV0012. (File Name: Exhibit T Carrier Frequency

Separation)

Number of Hopping Frequencies

Specification Requirements	Description	Comments/Deviations
15.247	Number of hopping frequencies.	

Opinion: The Equipment meets the intent specified by the requirements listed above.

Discussion: The Applicant has submitted test results in the form of a test report

Reference: Northwest EMC Test Report No. POLV0012. (File Name: Exhibit Y Number of Hopping

Frequencies)

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Output Power

Specification Requirements	Description	Comments/Deviations
15.247	Output Power.	

Opinion: The Equipment meets the intent specified by the requirements listed above.

Discussion: The Applicant has submitted test results in the form of a test report

Reference: Northwest EMC Test Report No. POLV0012. (File Name: Exhibit N Output Power)

Power Spectral Density

Specification Requirements	Description	Comments/Deviations
15.247	Power Spectral Density.	

Opinion: The Equipment meets the intent specified by the requirements listed above.

Discussion: The Applicant has submitted test results in the form of a test report

Reference: Northwest EMC Test Report No. POLV0012 (File Name: Exhibit Z Power Spectral Density)

Spurious RF Conducted Emissions

Specification Requirements	Description	Comments/Deviations
15.247	Spurious RF Conducted Emissions.	

Opinion: The Equipment meets the intent specified by the requirements listed above.

Discussion: The Applicant has submitted test results in the form of a test report

Reference: Northwest EMC Test Report No. POLV0012. (File Name: Exhibit P Spurious RF Conducted

Emissions)

Time of Occupancy

Specification Requirements	Description	Comments/Deviations
15.247	Time of Occupancy (Dwell time).	

Opinion: The Equipment meets the intent specified by the requirements listed above.

Discussion: The Applicant has submitted test results in the form of a test report

Reference: Northwest EMC Test Report No. POLV0012. (File Name: Exhibit DD Time of Occupancy-

Dwell Time)

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Conducted Powerline Emissions

Specification Requirements	Description	Comments/Deviations
15.247	Conducted Powerline Emissions.	

Opinion: The Equipment meets the intent specified by the requirements listed above.

Discussion: The Applicant has submitted test results in the form of a test report

Reference: STRATEST Test Report No. SL/EMC/0156/REVA (File Name: Exhibit AA Test Report from

Stratest)

Radiated Spurious Emissions

Specification Requirements	Description	Comments/Deviations
15.247	Radiated Spurious Emissions.	

Opinion: The Equipment meets the intent specified by the requirements listed above.

Discussion: The Applicant has submitted test results in the form of a test report. The initial submission was questioned due to the following problems noted in the STRATEST Test Report:

- □ The Wrong Pre-amplifier was listed in the report.
- ☐ The preamplifier actually used was operated outside of its' specified frequency range.
- □ No high pass filter was used for making the measurements.
- ☐ The report did not indicate that low, mid and high channels were tested.
- ☐ Measurement bandwidths were not indicated in the test report.
- ☐ The test set up photos indicated that separate grounding was used.
- ☐ Information describing the test modes and software used was not provided.

Due to some difficulty in resolving these issues additional test data was provided that may be referenced in the Northwest EMC test report. Though it is not a complete test, adequate testing was conducted to ensure the product was in compliance with the specified requirements.

Reference: STRATEST Test Report No. SL/EMC/0156/REVA. (File Name: Exhibit AA Test Report from Stratest), Northwest EMC Test Report No. POLV0012. (File Name: Exhibit Q Spurious Radiated Emissions)

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Processing Gain

Specification Requirements	Description	Comments/Deviations
15.247	Processing Gain	

Opinion: The Equipment meets the intent specified by the requirements listed above.

Discussion: The Applicant has submitted test results in the form of a memorandum. Since the module as it is being used in the Polyvision implementation has experienced no physical changes, the information provided is acceptable for application approval.

Reference: CSR Memorandum Dated: 23 MARCH 2001. (File Name: Exhibit O Processing Gain)

RF Exposure

Specification Requirements	Description	Comments/Deviations
2.1091	RF Exposure	

Opinion: The Equipment meets the intent specified by the requirements listed above.

Discussion: The Applicant has submitted a justification used for the original Mitsumi application. Since the Copy Cam implementation is actually using lower power, a lower gain antenna and is a mobile application there are no additional requirements for RF exposure.

Reference: 7 Layers Declaration of Modular Approval Letter No. 4_MITSU_0100_BT. (File Name: Exhibit EE RF Exposure)

Additional Bluetooth Requirements

Specification Requirements	Description	Comments/Deviations
Appendix A	TCB Training Material FEB-2002	Joe Dichoso's "TCB Issues"

Opinion: The Equipment meets the intent specified by the requirements listed above.

Discussion: The Applicant has submitted information in the form of a test report.

Reference: Northwest EMC Test Report No. POLV0012. (File Name: Exhibit J Technical Report-General Information)