

RE: Caterpillar Inc.
FCC ID: PQMWIFIBT
IC: 4071A-WIFIBT

ATCB022750

The response to comment 2, that channels 12 and 13 are passively scanned, suggests that they can be utilized. In that case, measurement data for these channels (either just 13, or both, if power reduction is utilized by both in order to facilitate bandedge compliance) must be submitted. Please address.

Response: Per the manufacturer, these channels can only scan and cannot initiate a probe request. Channels 12 and 13 cannot transmit.

Regarding the response to comment 4d, the separation distance used in the SAR test exclusion calculations must be met by the design of the EUT itself, or its specific installation and usage configuration. Please provide justification for the statement added to the RFx exhibit that the "EUT will always be at least 4.51 cm away from the operator." How was this distance determined? If, for example, the EUT will only be installed in the Caterpillar Display shown on p.13 of the User's Manual, then please provide photos/drawings showing the measurements used to determine this minimum separation distance from the EUT when installed in this device. I note, however, that p.13 of the Manual also references installation in "other supported devices" - what are these other devices - are they "Caterpillar network managers"? Other devices as well? How can the specified minimum separation distance that is listed in the RFx exhibit be guaranteed for all of these other supported devices? Please clarify.

Response: Please refer to the uploaded manufacturer diagram. In addition, this EUT will only be used in earth-moving machinery, which sets the minimum operator space envelope at 65 cm per ISO 3411.

Regarding the response to comment 4e, please explain why “the unit cannot be used with a laptop and can only be used with a Caterpillar display or a Caterpillar network manager”, as is stated in the RFX exhibit. The User’s Manual appears to direct the user to enter various different Linux code in order to configure the EUT to, e.g., act as an access point, connect to an access point, enable BLE, etc. What prevents an installer, or user, from connecting the EUT to a (Linux enabled) laptop to perform these configurations? Please clarify.

Response: Please refer to the updated user manual, specifically sections 1.1.1 and 3 (highlighting the sections below for emphasis).

“The Linux driver details are for informational purposes and only the Caterpillar D6:Cx Display is configured to utilize the Adapter. The drivers are hardcoded into the Display software and that software is programmed into the Display at the manufacturer. This software is not able to be accessed or downloaded from any external source.”

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