



# Washington Laboratories, Ltd.

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June 11, 2007

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

RE: Comments of June 4, 2007  
APPLICATION: QP8MEICARD MEI

Dear Mr. Fabina:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in ***bold italic***. Many responses refer you to additional exhibit(s) which has been uploaded to the application folder at the ATCB website.

Thank you for your attention. Please feel free to contact us for any additional information that you may require.

Regards,

*Steven D. Koster*  
EMC Operations Manager

*Brian J. Dettling*  
Documentation Specialist

WLL Project: 9720

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1) Please provide the resolution bandwidth and detector function for radiated emission measurements below 30 MHz represented in Table 5 of the test report. This information is missing from the test report.

***R. The test report has been revised to address Questions 1 & 2 in Section 4.2.1. The bandwidths that were used were the bandwidths specified in ANSI C63.4, we used 10 kHz for the resolution bandwidth and 10 Hz for the video bandwidth. That makes the detector function average.***

2) The limits and margins in Table 5 of the test report indicate a test distance of 3 meters was used for radiated emissions testing below 30 MHz, however, Section 4.2.1 of the test report states in two separate places that measurements were performed at 10 meters. Which is correct? Please amend the test report accordingly. In the future, better test setup photos of the radiated emissions measurements could show the test antenna in the background to help determine the actual measurement or test distance.

***R. The testing performed below 30 MHz was performed at 10 meters. The limit for the fundamental was derived using the 40 dB per decade roll-off allowed. With this roll off, the limit and margins are correct for the 10 meter measurement.***

***Testing above 30 MHz was performed at 3 meters.***

***Note: WLL can not provide test set-up photos that include the antenna because the area around the EUT is weather protected with a plastic structure and the antennas are place outside of the structure.***

3) For your information - The AC line conducted limits for a Part 15 intentional radiator are contained in Section 15.207 of the FCC Rules. These limits happen to coincide with the Class B digital device limits. You cannot use the Class A digital device limits for a Part 15 intentional radiator even though the intentional radiator is installed in a Class A digital device. Fortunately the test results show compliance with the Class B limits so no further action is required.

***R. The conducted emissions for the digital portion of the device were compared to the Class A limit because the unit is a Class A device. The emissions from the transmitter, namely the 13.56 MHz signal, were compared to the Class B limit as required in 15.209. This has been a long standing practice for Class A devices with transmitters to be compared to the Class A limit, with anything related to the transmitter compared to the Class B limit. Has that practice changed?***

4) We are also in receipt of your comment: "...the wrong year is cited for ANSI C63.4 version used for testing. This should also be fixed in the test report exhibit."

***R. The reference has been corrected in the revised test report.***