

August 7, 2007

RE: Janizary Holdings Inc.

FCC: RFK-DBSW819 (Responses to comments)

- 1, Please provide appropriate FCC agent authorization letter for this application.
Leon to handle this one.
- 2, Theory & Tune Up mentions operation up to 1920 MHz. I believe this should cite 1910 MHz. Please review.
Leon to handle this one.
- 3, Test Report mentions Part 90 (page 5). Application only supports Part 22/24? Please explain.
(This was a carry over from a previous report, Part 90 reference has been new removed)
- 4, The application appears to not provide both DC voltages AND currents applied into the several elements of the final radio frequency amplifying device for normal operation over the power range as required by (2.1033(c)(8)).
(This is something that has not been required in previous submittals, Please be advised that this device has no frequency generating components. If this is required please have Tim provide the information as we do not take the boosters apart to gain access to internal components neither do we have the schematics to determine the points of measurement to provide the data requested.)
- 5, Please define the units used for in/out levels cited.
Units of measure were dBm – report has been updated.
- 6, Given the unique nature of AGC based upon measured values from the portable input that can affect both sides of the TX output – it is uncertain if strictly increasing the input level until the output level stops will provide the highest output level. It appears that a higher portable input level would affect both the TX outputs. Please explain how this was explored to ensure highest output levels were achieved.
I am not sure what is meant by “both TX outputs” this device has an uplink and a downlink in two ranges of operation. A TX output implies that there are frequency components such as a repeater might have, this does not. What goes in comes out. As far as determining maximum value this has been the accepted practice for this type of device for the last four years. But I have tested the device in various configurations to determine the maximum output power per modulation type.
- 7, Please confirm the input signal(s) used into the device for spurious radiated testing. Was this CW as expected by the FCC guidance?
According to the guidance document CW is acceptable but not expected. Actual modulation types were used to avoid confusion and to be consistent with past submittals.
- 8, FYI RF exposure does not appear properly calculated. For instance, the final calculations should be for possible simultaneous TX:

$$\frac{0.046}{0.549} + \frac{0.018604}{1} + \frac{0.001}{0.579} + \frac{0.000368}{1} = 0.104 \text{ (must be less than 1)}$$

This was an error on my part when updated to report revision –002. It has been updated and included.

- 9, Please provide an appropriate filled out RSS-102 Annex B (and A if applicable). Note this is included as part of our IC form (see attached). Note there has been a few revisions to the IC form since the version you provided.
Not sure that Annex A or B is applicable for this device.
- 10, For IC, kindly explain where RSS-131 section 4.2 test data information can be found.
In previous submittals the Occupied Bandwidth measurements have been used to show compliance with this requirement, we would like to carry on this method if possible. If required on future submittals we can adjust the measurement procedure to reflect the requirement more specifically.
- 11, Power measurements do not appear to be according to RSS-131, section 4.3.1 (2 tone for multichannel devices). Given the design of this device, this test would seem applicable.
These devices have always been submitted as single channel amplifiers as that is there intended usage. As such power measurements were made (as in previous submittals) with the maximum available output per channel (low, mid, high) per each type of modulation used.