

To: "Timothy R. Johnson" <tjohnson@AmericanTCB.com>
Subject: RE: Review of Athena Feminine Technologies, Inc., FCC ID: RMLE03946001

Dear Tim,

Thank you for the comments.

This is a partial reply to the comments and questions that you raised on the Athena Feminine Technologies Wireless Control Unit (i.e. Remote), and on the Athena Trainer Unit (i.e. Probe) in your letter dated 11 February 2004 for FCC ID: RMLE03946001.

Your comments/questions are listed below, followed by our responses.

Question 1:

1) Photographs were provided for both the probe and remote. Note that the application being reviewed will only cover the remote TX portion of the system. Various items provide specific to the probe (Internal photographs, schematics, etc) are not being reviewed. Assuming the probe is strictly a RX, the probe should be approved as a RX under a separate DoC or Certification application as desired by the manufacturer.

Answer 1:

We thought that it was clear from the text of Section 1.2 and Annex A of the Test Report that the Probe (which is a receive-only device) is being approved by Acme Testing Co. under the DoC Procedure.

The DoC Procedure information on the Probe was provided to you in the Test Report because it is FCC Policy that a standalone TX cannot be approved unless there is an accompanying Test Report for the Receiver that is to be used with the TX. Please note that we do NOT wish for the Probe to be submitted for Certification Procedure Approval by ATCB.

Question 2:

2) It appears that a DoC is being applied as for the probe as a RX. However, the manual does not include the appropriate DoC information per 2.1077. See below:

COMPLIANCE INFORMATION FOR DoC AUTHORIZATIONS (47CFR 2.1077)

If a product is tested and authorized under a Declaration of Conformity, a compliance information statement shall be supplied with the product at the time of marketing or importation, containing the following information on a single page (in the users manual or as a separate sheet):

- (1) Identification of the product, i.e. name and model number.
- (2) A statement similar to that contained in Section 15.19(a)(3) that the product complies with Part 15 of the regulations.
- (3) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.

Answer 2:

The probe is indeed is going for a DoC Procedure approval by Acme Testing Co. We will contact the manufacturer to have the manual corrected to include the information required in Section 2.1077 and Section 15.19(a)(3).

Question 3:

3) Please confirm if the remote is a transmitter or a transceiver.

Answer 3:

The "remote" (formally called the Wireless Control Unit) is a Transmitter. It is not a Transceiver. (Please see Section 4.1 of the Test Report, which states this clearly).

Question 4:

4) Please provide external photographs of the back of the remote.

Answer 4:

Acme Testing will take new photos, and will upload them soon.

Question 5:

5) Please provide a clearer/closer photograph of the top of the main board in the remote.

Answer 5:

Acme Testing will take new photos, and will upload them soon.

Question 6:

6) Please note that a detailed technical operational description referenced in the confidentiality request letter does not appear to have been provided. The product brochure provided is not confidential information, therefore confidentiality can not be granted on this item. Is there another file provided that confidentiality was referencing? If not, please remove the request for confidentiality from the request letter.

Answer 6:

The Detailed (2-page) Technical Operational Description will be uploaded. (We apologize for this omission).

Question 7:

7) The label provided shows "FCC ID: E03946001". However, from the 731 form, it is expected that the label would state "FCC ID: RMLE03946001". Please review and correct as necessary.

Answer 7:

The manufacturer will be contacted for the label revisions. The revised label artwork will be uploaded as soon as it is available.

Question 8:

8) Please justify the use of the DoC labeling information (FCC Logo and associated text) on the remote. This labeling is reserved for particular

approvals that do not appear to apply to this device (PC Peripheral, Stand alone RX, etc.).

Answer 8:

It has been decided by the manufacturer that the placing the DoC labeling applicable to for a standalone RX on the Probe would be impossible, because the probe is inserted into a body cavity, and Mylar type labels would be destroyed during use and subsequent cleaning. Metal and/or molded-in labeling would create rough surfaces which could cause internal damage to the user. Consequently, it was decided to place the labeling for the Probe on the Remote. That said, after reviewing the label again it is clear that some words should be added to the label to clarify that the FCC ID applies to the Wireless Remote Transmitter and that the FCC logo and 15.19(a)(3) text applies to the Trainer (i.e. the Probe). The manufacturer will be advised to modify the label accordingly. Please note if this approach is NOT acceptable, we need to be notified immediately because label artwork is both expensive and a long-lead item.

Question 9:

9) The label should include the 2 part statement specified in 15.19 (a)(3). Please correct.

Answer 9:

Please see answer to question 8.

Question 10:

10) Please correct the spelling to the word "modifications" given in the FCC statements in the users manual on page 14.

Answer 10:

The manufacturer will contacted to correct this. We will upload the revised manual as soon as it is available.

Question 11:

11) Please confirm that all testing was performed with "fresh/brand new" batteries during the testing.

Answer 11:

We hereby confirm that NEW, the fresh batteries were used during all tests performed on the Wireless Control Unit (i.e. "Remote"). We hereby also confirm that the Trainer Unit (i.e. the "Probe") was equipped with a NEW, fresh battery during all tests performed on it.

Question 12:

12) Please explain the use of the 15.209 limit to the 868 MHz reading. It appears only the 15.231 limit should be applied to this.

Answer 12:

This an error in the Test Report. The 868 MHz reading is indeed subject only

to the 15.231 limit. The Tables in Section 7.4 of the Test Report will be corrected to reflect this. Unfortunately we will need to upload an amended Test Report. We will upload it shortly.

We thank you for your prompt attention in these matters. Please don't hesitate to contact me if you have any for questions or concerns.

For and on behalf of Acme Testing Co.

Harry H. Hodes
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-----Original Message-----

From: Timothy R. Johnson [<mailto:tjohnson@AmericanTCB.com>]
Sent: Wednesday, February 11, 2004 1:51 PM
To: hannah@acmetesting.com
Subject: Review of Athena Feminine Technologies, Inc., FCC ID: RMLE03946001

Hannah,

Attached are comments regarding review of this application.

Thank You,

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