

21 June 2011

NCEE Labs Response to ACB comments from June 15, 2011

NCEE Labs responses are in [blue](#).

1. Please provide 15.19 statement in user manual.

This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions:

(1) This device may not cause harmful interference, and

(2) this device must accept any interference received, including interference that may cause undesired operation.

[A revised manual has been provided. Please see "WRMS Cellular Tank Monitor – Operation Manual RevP4 – 2011-06-16.pdf"](#)

2. You have listed internal photos as confidential. This will require a PBA with the FCC which will add a fee to the application. You might also have to have a NDA in place to show how you are going keep these photos confidential. Please see attachment concerning internal photo confidentiality.

[The internal photos are no longer requested to be held confidential. Please see "MT9100CTM-Confidentiality Request rev2.pdf"](#)

3. Please show where the GSM transmitter is located in respect to the ISM transmitter if their antennas are closer than 5cm we will need to have investigate if SAR testing for co-location configuration is needed or not. Also if these two transmitters are capable of transmitting simultaneously we need that documented in the test report showing the ISM was tested while the GSM was transmitting or we need a statement that they do not transmit at the same time.

"Disregard initial question for number 3. What we will need is something showing the antenna location with respect to each transmitter and if they are within 20cm as stated in the user manual then we will need a MPE report justifying co-location."

[A new Functional Description document has been provided, stating that the transmitter are not permitted to transmit simultaneously. Please see Section 3.1, paragraph 2 of "WRMS Cellular Tank Monitor - Functional Description RevB - 2011-06-16.pdf"](#)

[A revised internal photo exhibit has been included to show the location of the antennas and the distance between them. Please see "MT9100CTM Internal Photo Exhibit rev2.pdf"](#)

4. On the form 731 you state this is a composite application please explain how this is a composite application as there is only one test report for DTS that was uploaded.

The 731 form has been revised to state that it is not a composite device. Please see "RWB-MT9100CTM-Form-731 rev2.pdf"

5. As this will be classified as portable because of the 60/frequency threshold the EUT should be tested in the X, Y and Z axis. If this was done please state that it was in the test report.

An amended test report has been provided with additional description on the EUT test setup. Please see "R060311-40A.pdf"

6. In the test report the 6dB bandwidth plot does not show the delta of 655.31kHz please show a plot that fits this data.

An amended test report has been provided with a 6dB bandwidth plot included. Please see "R060311-40A.pdf"

7. For Industry Canada the Canadian representative letter must be signed by the Canadian Rep and also show their company number. Please revise the Rep letter to include this.

A new Canadian representative letter has been provided with a signature by the Canadian representative and their Canadian company number included. Please see "Westel\_IC2.pdf"

8. For Industry Canada the REL letter is from 2009 these letters are only good for one year from issue date please upload a more recent REL letter.

An updated letter has been provided. Please see "ATCB IC Ack of Listing Reqs rev2.pdf".

9. The IC application form must have the Canadian Rep company number filled in please revise to include this number.

The IC application has been revised to include this number. Please see "115A-MT9100CTM-IC Form rev 2.pdf"

10. For the IC application on page two at the top the type of equipment must be included if you are having trouble with this form please download the latest form from our website under forms and docs.

The IC application has been revised to include this information. Please see "115A-MT9100CTM-IC Form rev 2.pdf"

11. I notice you have two powers listed one for watts conducted and one for field strength please list conducted power only if the power listed is for the same transmitter if they are not the same transmitter then please explain.

The IC application has been revised so as to not include the field strength levels. Only the conducted power is included. Please see "115A-MT9100CTM-IC Form rev 2.pdf"

12. IC application listed model number does not match the model number on the label please confirm which is correct and revise the application form or label.

An updated label exhibit has been provided. The new labels read "MT-9100CTM". The S10 suffix is included, but with a space after the model number, to indicate that it is not part of the model number. Please see "WRMS Cellular Tank Monitor Labels RevP2.pdf"

13. The unique product number on the IC application does not match the UPN on the label. Please confirm which is correct and revise accordingly.

See the response to number 12.

A handwritten signature in black ink, appearing to read "Nic Johnson", with a long horizontal flourish extending to the right.

Nic Johnson  
Test Engineer  
NCEE Labs  
402-472-5880  
njohnson@nceelabs.com