

March 8, 2008

RE: Bartec USA LLC

FCC ID: SX8-DSW

The following is in response to the comments made on the above referenced application:

1) Due to various concerns recently seen about proper authority being given to others for FCC and/or IC matters, the agency letter should be signed by someone traceable to have the proper authority. For instance, the FCC site shows Glen Harm as the correct contact of authority for FCC matters. Therefore the agency letters should be signed by this contact or alternatively a letter showing who he has "deputized" (i.e. Scot Holloway) to sign on his behalf may be provided as well.

The FCC Database has been updated to reflect Scot Holloway as the proper contact.

2) This device contains a USB port. Please explain if this device is subject to Part 15 Class A Verification, Part 15 Class B Certification or DoC'd. Note that currently information provided in the application and labeling do not support Part 15 Class B Certification or DoC. It is assumed this device is subject to Part 15 Class A as a PC peripheral, but needs to be confirmed.

Yes, as stated in the test report this is a Class A peripheral, subject only to verification.

3) Manual appears to be missing 15.21 information.

The user's manual has been updated to include this information.

4) Report cites loop antenna was placed 1.5 meters above ground plane. Section 8.2.1 of ANSI C63.4 requires center of loop to be 1.0 meters above ground plane. Note that photos suggest closer to 1.0 meter. Please confirm.

The loop was placed at 1.0 meters. This is a typographical error in the report and has been corrected.

5) For 15.207 (AC powerline conducted emissions), this is expected to be performed while TX'ing. Note that 15.109 applies to RX/digital device modes, while 15.207 applies to when the device is TX'ing. However report references this data is in the RX report. Please review.

Section 5.4 of the test report clearly indicates that the device was tested while transmitting. The limits for unintentional conducted emissions in section 15.107 and 15.207 are equivalent.

6) This device is portable, but test report does not appear to discuss testing the device while positioned in each of 3 axis as required by ANSI C63.4. Please review.

Sections 5.1 and 5.2 of both test reports clearly indicate that the device was tested for multiple orientations. Furthermore, test setup photographs also state that they are depicting only one of three axes tested.