

Finally, a modular approval cover sheet addressing the issues from the FCC Public Notice has been added to the exhibit list. Comments have been addressed as follows.

1) The frequency on the 731 form appears incorrect for the TX. This should be the actual tunable frequency band for Part 15, not band of operation. Please correct. **Done.**

2) Regarding your response to the modular approval and shielded enclosure, we have not seen where immunity has satisfied the FCC. The immunity test itself would require the FCC to address issues such as acceptable frequencies to investigate, levels to test to, was the device only tested for functionality or was power/modulation also observed, etc. Please note that to our knowledge the FCC has only allowed this issue to be resolved without a shield in situations where the host is known and the device has also been tested specific to the host. The approval is then limited to the host tested. A Permissive change must be performed with new EMC emissions provided for each specific host to be added to the approval. Please see recent similar FCC response on this issue attached. **Modular approval cover sheet added. A modification is listed in the report. Photos have been updated.**

3) If the shielding issue can not be adequately addressed, please provide an external photograph exhibit for this application (i.e. end use device) and updated labeling exhibits. **N/A**

4) It appears that the mW provided in the new RF exposure exhibit may be off by a factor of 10. Please re-verify and correct if necessary. **Done.**

5) The operational description states that the device has a controllable output power level. Please confirm the device was appropriately set to the maximum power. **Addressed in EUT operation section of the report.**

6) Radiated spurious emissions are required by the FCC to be tested at low, middle and high channels as well. Section 1.3 of the report implies this did not occur. **Retested. Photos and plots updated.**

7) Please confirm the channels the device was on during bandedge testing. For purposes of this test, the device should be tuned to the lowest and highest channels. **Added Notes to the data sheet.**

8) Regarding the emission in the 19-25 GHz, the correction is acceptable. However, the table of data should denote peak and average measurements as appropriate for these emissions as well in addition to the "Noise Floor" denoted. The confusion comes from the fact that the peak and average limit appear to be the same if you mix data from different test distances and some labs report peak vs. average limits, or try to only show average measurements. Alternatively you can add a column to denote correction of the test data for test distance and correct the data by this number and compare all to the appropriate Peak limit of 74 dBuV/m and average limit of 54 dBuV/m. Please correct. **Done.**

9) The duty factor information suggests the worse case TX times is 84.4% (10.8 mS in 12.8 period). However it is uncertain if the 12.8 seconds is the full period length or not. Additionally, this device is being requested for a modular approval, and it is uncertain what devices/controls would be attached to such device. Without a specific configuration, there is not a guarantee of worse case TX time being less than possible by the TX itself. Note that the FCC uses worse case TX time, even if this rarely occurs in order to cover all possible configurations. Please correct the radiated tables for average duty factors using worse case duty factors. **Done.**