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18 October 2006

FCC: T52965AMSBT
IC:
ATCB: 4104, Comments dated 101406

In response to your comments regarding the application for certification of the devices referenced above please find our responses below:

1	The confidentiality letter requests confidentiality of the product photos. Product photos cannot be held confidential. Short term confidentiality can be requested for this exhibit. If this is desired, please upload a letter requesting short term confidentiality. Either way, please edit the current confidentiality letter to remove the reference to the product photos.
Reply	***That was an error. Short term confidentiality is <u>not</u> requested. A revised confidentiality letter is uploaded, see Rev 1.***
2	Please add a FCC "non modification" statement to the manual.
Reply	***The warning will be applied to the user manual and uploaded as soon as it becomes available.***
3	Please revise the RF exposure exhibit for this device to show the MPE based on the TOTAL EIRP of the two transmitters. Since the two transmitters may transmit at the same time, please be sure to add the EIRP of the two transmitters together when calculating the MPE.
Reply	***The two transmitters arbitrate for channel access using signals between the two radio chips that prevents simultaneous transmission. As explained by the designer [quoting]:*** BT and WL are the basic arbitration signals. Its simplest arbitration proceeds as follows: If Bluetooth wants to transmit, it raises the BT signal to indicate its intentions to the WLAN chip. Once Bluetooth has raised the signal and determined that WLAN does not want to access the medium, it has ownership of the band. WLAN access to the medium works in the reverse manner. It raises the WL signal and verifies that Bluetooth does not want access at that time. Once one system or the other has ownership of the medium, the other chip needs a means of requesting that ownership be transferred. This is accomplished by raising its signal (BT or WL) and waiting until the other system lowers its signal. The timing diagram in Figure 3 [not provided] shows the states of the BT, WL and RXIND signals during a typical arbitration sequence. - Bluetooth and WLAN reserve the medium before transmitting to avoid simultaneous transmissions - WLAN can reserve medium during backoff sequence.
4	It appears that two grants are being requested (two FCC IDs). Please note that if these two transmitters are modular transmitters then the outer host label must say "Contains FCC ID:xxxx", Otherwise it is unclear why two IDs are being used. Keep in mind that it is the host device that is being certified, not the individual transmitters. Both transmitters can be certified under one ID for each country (US and Canada) Please advise.
Reply	***Only one ID is requested with a composite application. The application is not modular. The two radios are for use only in the single host, the 965AMS. The initial documentation was based on two IDs, but revised documents (e.g. ID label) have just one ID.***
5	FYI: There appears to be an error with the Duty cycle measurement. While the plots does indicate an "ON" time of 2.96ms, the plot appears to show approximately 1 ½ divisions per pulse. At 2 mS per division, this would be approximately 30 ms ON time. It is noted that this does not affect the compliance of the unit.
Reply	***Thank you.***
6	Please note that the PEAK TRANSMIT power has to encompass the entire signal. This measurement was made in a radiated test setup using a spectrum analyzer. Please verify / clarify if the power reported in the total integrated RF power across the reported 20 dB BW.
Reply	***The EUT provided a CW transmit mode which was used to measure power. Verified in a test log record. The spectral content of the CW emission was verified in a plot added to the revised report. Report amended and uploaded to document transmit mode.***
No #	FYI: Please note that on page manual page 177 the emission paragraph refers to this as being a class A device, while the Canada ICES 003 statement in the paragraph below refers to it as being a class B device.
Reply	***The 965AMS was tested for Class B with the radios operating. The 965AMS is a legacy product now pending addition of the wireless radios. The 965AMS has other functions that are Class A in nature as test equipment, such as its time domain reflectometer (TDR) which is typical of telecom line diagnostics. The non-wireless legacy design has been tested for Class A compliance previously.***

Eric Lifsey

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