

1. Sections 8.0 of the FCC transmitter test report and IC transmitter test report both state that the transmitter was continuously transmitting during testing. Please describe exactly what you mean by this statement. Was the transmitter continuously transmitting a CW signal or was it continuously transmitting a pulsed signal or string of pulses? If pulses were used, how often did they occur? (I believe a CW signal was used because I see very little difference between maximum peak and average field strength values on the band edge plots submitted in this test report)

Response: The On-Time of normal operation is only approximately 212us once every several minutes (see Duty Cycle plots). Therefore the device was set up to transmit a continuous carrier (unmodulated) for measurement purposes.

2. The submitted IC confidentiality request letter asks for confidentiality of a parts list exhibit. There is no parts list exhibit submitted in this application. Please either amend the IC confidentiality request letter to exclude the parts list exhibit or submit a confidential parts list exhibit for this application. Also note that the FCC confidentiality letter asks for confidentiality of the technical product description but the IC confidentiality letter asks for confidentiality of the description of operation. Although these are the same exhibit, I recommend that all exhibits on both letters be given the same exact title to avoid any possible confusion.

[See updated Confidentiality Letter.](#)

3. For the IC receiver test report, please provide the resolution bandwidth used on the measuring instrument for radiated emission measurements below 1000 MHz.

[See updated test report.](#)

4. For the IC receiver test report, please provide the resolution bandwidth used on the measuring instrument for radiated emission measurements above 1000 MHz.

[See updated test report.](#)

5. The IC receiver test report shows LISNs used as test equipment for this battery powered device in Table 1 of the submitted test report. Further Section 5.0 of the IC receiver test report describes how AC line conducted tests were run. Although Section 10 of this test report states that AC line conducted tests were not required for this battery powered device, I believe this statement should also be in Section 5.0 of the test report and Table 1 should be amended to reflect the equipment actually used to test this device.

[See updated test report.](#)

6. The information provided in Sections 4.0 and 5.0 of the FCC transmitter test report (pages 6 and 7 of 31) should be included in both the IC transmitter and receiver test reports. This information describes how emissions from a device are maximized. It also includes resolution bandwidth information requested in items 3 and 4 above. Please add these descriptions to the IC test reports.

[See updated test report.](#)

7. Section 6.0 of the IC transmitter test report (page 6 of 32) mentions RSS-310. I believe this reference is incorrect. Please delete it or explain why it is needed.

[See updated test report.](#)

8. Please make the following correction to the IC application form:

(a) Change receiver spurious worst case emission from 43.6 dBuV/m @ 3m to 47.8 dBuV/m @ 3m shown on page 38 of 41 of the submitted receiver test report. (The 47.8 level is higher than the one currently listed on the application form).

[See updated RSP-100 Form.](#)

9. Please explain the FCC logo on the equipment label. The FCC logo is used for approval under the Declaration of Conformity (DoC) procedure for the FCC but I see no portion of this device that qualifies for approval via (DoC). As I explained to Mr. Stumpf in the attachment, the FCC does not consider a device that has its battery charged from the USB port of a computer to a PC peripheral that requires approval via the DoC procedure.

Response: This device has the ability to connect to a PC through a USB connected port in order to charge the battery and for data transfer between the host PC and the device. Therefore it is a Class B PC Peripheral and needs the DOC marking label. The transmitter does not operate while connected to the PC.