



American Telecommunications Certification Body Inc.  
6731 Whittier Ave, McLean, VA 22101

September 26, 2008

RE: ATCB006798 – Class II Permissive Change / Reassessment Application

FCC ID: T8P-SL24TT1 & IC: 6459A-SL24TT1 for Saris Cycling Group, Inc.

I have a few comments on this Application. Please **do not put confidential information** in your responses to these questions because the response letter will not be held confidential by the FCC. Depending on your answers there may be more questions.

Comments on the FCC application

1. Please provide a statement indicating how the additional channel or frequency (2453 MHz) is generated by this device. The FCC will only permit a Class II permissive change if this transmitter originally had the capability to generate the 2453 MHz signal along with the one originally approved (2457 MHz). Please clarify how this signal is generated.

[See letter from Ed Watson \(Saris Cycling\).](#)

2. For Your Information – The duty cycle correction factor calculated from the submitted spectrum analyzer plots is -53.8 dB but the factor used in the radiated emission result tables is -58.3 dB. The numbers in the duty factor have been transposed! This will not affect compliance because of the large margin to the limits in this instance so I am not requiring the radiated emission result tables to be corrected. Please be careful when recording results in test reports in the future.
3. For Your Information 2 – The receiver test report for 2.4 GHz was not reviewed for the FCC portion of this filing. FCC receiver rules only apply between 30 and 960 MHz. In addition, a receiver that is contained with a Certified transmitter is subject to Verification in accordance with Section 15.101(b) of the FCC Rules.

## Comments on IC application

1. Because of the way IC has their database set up, ATCB cannot process a reassessment application for model numbers PowerBeam, Pro 300PT-T (note error in model number on application) and PowerTap SL 2.4 and the addition of model number Computer + to a previously existing family in one application. Only 3 model numbers were originally approved under IC: 6459A-SL24TT1 (Computer + was not. See first attachment to this email). According, please amend the IC application for a reassessment for model numbers PowerBeam, Pro 300PT-T and PowerTap SL 2.4. You will have to file model number Computer + in a separate IC application for an existing family (family to a previously certified model under Section 5.2.2 of RSP-100).

### Response:

The error in the model designation on the application has been corrected – thank you for pointing this out.

We do not quite understand the request for a separate application for model Computer +. Hopefully the following information should clarify and resolve the request. The original grant was for a **Limited Modular Approval**, listing 3 different host models that the RF module could be installed in. Part of this Permissive Change is to add an additional host model to the existing LMA. This is not, nor has it ever been, a Family Certification, but rather it is an LMA. Our understanding of the IC requirements is that our client should be allowed to add additional host models to the existing LMA by filing (with data from the new host model) as a Class 2 PC (similar to FCC requirements).

2. For the reassessment application, please provide an IC application form that bears a handwritten signature in page 1 of the application form and lists the three model numbers shown on the IC REL attachment. IC now requires either handwritten signatures or electronic signatures on its applications.

[See updated RSP-100](#)

3. For the reassessment application, please provide an Appendix B of RSS-102 as specified in Section 5.4(e) of RSS-100. Only Appendix B is required because this device meets the exemptions in Section 2.5.1 and 2.5.2 of RSS-102.

[See Annex B](#)

4. For the reassessment application, please revise all exhibits to remove information on the model number Computer + since this model number will not be included in the reassessment.

[See answer to number 1.](#)

5. For the application for new model number Computer +, please provide the information listed in Section 5.2.2 of RSP-100 for an existing family approval only for the model number Computer + since that is the only model number being approved under this application.

[See answer to number 1.](#)

6. For the application for new model number Computer +, please revise the IC label because it is confusing. It appears that one label exhibit shows the label etched into the plastic on the back of the device but another label exhibit shows a plastic label permanently glued to the back of the case. Please correct this label before resubmitted in the application for an existing family.

**Response:**

[Label exhibit "14616 Saris TT1, RSS-210 XCVR computer+\\_label" shows where the label will be pad printed onto the device. The exhibit "14616 Saris TT1, RSS-210 XCVR computer+\\_label size" is simply a dimensional drawing.](#)



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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.