



American Certification Body Inc.
6731 Whittier Ave., Suite C110, McLean, VA 22101

August 9, 2011

RE: ATCB010946 – Original Equipment & Single Certification Applications – Model: Powertap 3

FCC ID: T8P-TT3G3 & IC: 6459A-TT3G3 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.

1. The internal photos exhibit does not clearly show the components and the component locations on the PC board (chassis) as specified in Section 2.1033(b)(7) of the FCC Rules. Please provide new photos that are focused and clearly show the components and their location on the PC board. [A new exhibit titled "Saris Powertap 3 RF Module Internal Photos \(2\)" has additional photos.](#)
2. The submitted description of operation exhibit states that most of these devices operate at 2457 MHz. This does not agree with the rest of the application where this device operates between 2405 MHz and 2480 MHz. Please address this discrepancy. [The current protocol calls for the device to transmit on a fixed frequency channel of 2.457 Ghz. We would like to keep our options open to transmit on a different channel if the ANT+ protocol is expanded to add additional functionality. This is not a frequency hopping application. The primary reason for the broad band certification is to accommodate secondary channels or compliance with different communication protocols:](#)
 - a. [We may want to use this device to broadcast a different set of metrics. ANT has a set of standard protocols, some of which are on different frequencies in the 2.405 to 2.480 range. This would continue to be a fixed frequency transceiver, but on a different channel.](#)
 - b. [There have been some discussions among the ANT+ community about assigning secondary channels that would be negotiated between transmitter and receiver if the RF link quality is poor on the primary channel. Again, this would be a discrete step to a secondary channel, not a frequency hopping system. This change would happen on the scale of minutes to hours.](#)
3. The modular approval request letter does not address Section 15.212(a)(1)iv) of the FCC Rules for stating that the modular transmitter meets Sections 15.203, 15.204(b) and 15.204(c) of the Rules. When combining a modular approval request letter, both the IC and FCC Rules must be addressed. Please provide an amended letter that meets this requirement. [The first item on the second page of the Modular Approval Request Letter addresses this.](#)
4. In the submitted user manual, there are no instructions for labeling the enclosure of the device into which this modular transmitter is installed with the proper FCC and IC numbers. See Section 15.212(a)(1)(vi)(A) of the FCC Rules and Section 3.2.1 of RSS-Gen Issue 3 dated December 2010 (RSS-Gen). Please provide an amended user manual that meets this requirement. ["Saris Powertap 3 RF Module Host Labels Letter" is a note regarding the manufacturer's acknowledgement of the labeling requirement.](#)

5. I have noted the following issues/problems with the IC application form:
 - (a) One of the types of equipment listed on the form is Modular Approval when this really is a Limited Modular Approval. Please correct the form accordingly. [As discussed, this will remain a Modular Approval.](#)
 - (b) The maximum field strength for this transmitter should be listed on the REL in Canada rather than the EIRP since the limit for this device is listed as a field strength. Please correct the form according with the maximum (peak) field listed on page 17 of 47 in the submitted test report. [Corrected. A revised IC Application has been submitted.](#)

6. For Your Information - I will be changing the Equipment Class for this device from DXT to DXX. Although a receiver that is part of a transceiver is subject to Verification, the receiver in this transceiver operates outside the frequency range (30-960 MHz) where Certification/Verification is required by the FCC. Accordingly the equipment class should be DXX for approval at 2.4 GHz under Section 15.249 of the FCC Rules. [Thank you.](#)