Request for Additional Information for EMC Certification

Company:	CC&C Technologies(SGS)	**Composite Device:**	**Yes:** ☐	**No:** ☒
MT#:	81956	**FCC Direct Filing:**	**Yes:** ☐	**No:** ☒
		Permit But Ask:	**Yes:** ☐	**No:** ☒
FCC ID:	WKLWL6201V1	**FCC Rule Part:**	15.247	
UPN:	-	**RSS Standard:**		
FRN:	0017995770	**Class II PC/Reassessment:**	**Yes:** ☐	**No:** ☒

October 28, 2009

Dear San,

Thank you for your application. In order for us to process your approval, the following must be addressed. Please provide a response in a timely manner to avoid delays or dismissals.

Technical Review:

1. Please correct the FCC Form 731 submitted in this application to correct the Equipment Class from DSS to DTS, and to list the maximum power and the 2 frequency bands of operation (2412-2462 MHz, and 2422 – 2452 MHz).

2. The RF power is listed as 15.7dBm max, = 37mW, which is above the 60/f(GHz) threshold for 2.4GHz of 24mW. This device appears to require SAR compliance. Please provide RF Exposure SAR compliance documentation, including compliance with the USB Dongle requirements of FCC KDB #447498.

3. Please replace the Internal Photos with photos that are in focus.

4. The Users Manual Technical Specifications indicate that the power is <13dBm in all modes; however the measured RF power in the test report lists powers as high as 15.5dBm. Please clarify and correct exhibits as needed.

5. The antenna documented in this application is a PCB trace antenna. Please provide the antenna specifications, including antenna gain, to show compliance with FCC 15.247(b)(4).

6. The Peak Power Spectral Density plots show a sweep time of 170msec, which does not comply with the requirements of the FCC DTS Measurement Procedure documented in FCC KDB # 558074. Please re-measure in accordance with the appropriate FCC DTS measurement procedure.

7. The Radiated Spurious Emissions of the frequencies in the restricted bands of 15.205 did not list the restricted bands immediately outside of the 2.4-2.4835 GHz band. Please submit Radiated Spurious Emissions data at 2.390 and 2.4835GHz against the 15.209 limit. Also, please clarify the report since radiated Spurious Emissions of FCC 15.247 only applies to the frequencies in the restricted bands of 15.205 (the tables in the report list many frequencies that are not in the restricted bands).

If you have any questions or concerns, please contact us.

Thank you!

Jennifer Sanchez
TCB Administrator
MET Laboratories, Inc.
tcbinfo@metlabs.com

Admin Review By: Jennifer Sanchez
Technical Review By: Chris Harvey

Please note that partial responses increase processing time and should not be submitted. The items indicated above must be provided before processing can continue on the above referenced application. Failure to provide the requested information in a timely manner may result in application dismissal.

Jenn Warnell

From: Yuan, San (Shanghai) [San.Yuan@sgs.com]
Sent: Saturday, November 07, 2009 12:56 AM
To: Jennifer Sanchez
Cc: Jenn Warnell
Subject: RE: 81956 SGS - TCB Request for additional information (CC&C Technologies, FCC ID: WKLWL6201V1)
Attachments: SHEMO09080095102 MPE.pdf; Form 731 rev.pdf; internal photos rev 1.pdf; SHEMO09080095101 rev 1.pdf; User_Manual rev 1.pdf

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Potentially dangerous attachments were identified and removed from this
message.
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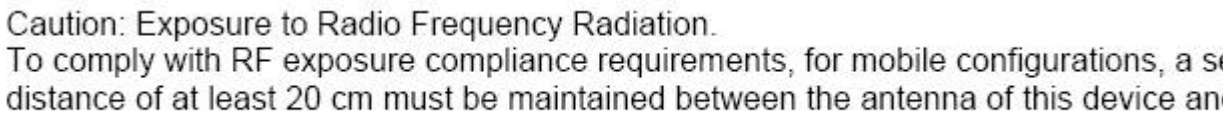
Dear Jennifer:
The attach file is the update documents.
For SAR test in the request 2 ,The client declare the product should be 20 cm between the antenna and persons always be used .It is show
As follow information in the page four of the user manual .So wo have done the MEP test report


Caution: Exposure to Radio Frequency Radiation.
To comply with RF exposure compliance requirements, for mobile configurations, a s
distance of at least 20 cm must be maintained between the antenna of this device an

Please let me know if you have any problem
Thanks for your help.

Best wishes

San Yuan
SGS-CSTC Standard Technical Services Co., Ltd
E&E EMC Lab
Tel: +86 21 6191 5653
Fax: +86 21 6191 5655
Email:san.yuan@sgs.com
Website: www.cn.sgs.com

From: Jennifer Sanchez [mailto:jsanchez@metlabs.com]
Sent: 2009年11月6日 1:23
To: Yuan, San (Shanghai)
Cc: Jenn Warnell; Jennifer Sanchez
Subject: RE: 81956 SGS - TCB Request for additional information (CC&C Technologies, FCC ID: WKLWL6201V1)
Importance: High

Hi San,

I just wanted to follow up with you on the status of your TCB application.

Please let me know if you have any questions.

thanks!

J. Sanchez
TCB Administrator
MET Laboratories, Santa Clara CA
408-207-4785 Office
408-829-1603 Cell
jsanchez@metlabs.com

Jennifer Sanchez

From: Yuan, San (Shanghai) [San.Yuan@sgs.com]
Sent: Friday, November 27, 2009 1:09 AM
To: Jennifer Sanchez
Cc: Jenn Warnell; Shawn McMillen
Subject: RE: 81956 SGS - TCB 2nd Request for additional information (CC&C Technologies, FCC ID: WKLWL6201V1)
Attachments: SHEMO09080095101 rev2.pdf; SAR report SGS_SHEMO09080095103_V1_0.pdf

From: Jennifer Sanchez
Sent: Monday, November 09, 2009 2:34 PM
To: 'Yuan, San (Shanghai)'
Cc: Jennifer Sanchez; Jenn Warnell
Subject: 81956 SGS - TCB 2nd Request for additional information (CC&C Technologies, FCC ID: WKLWL6201V1)
Importance: High

Hi San,

Please see the reviewer's comments below:

A. You have indicated that this USB Dongle must be used with a separation of 20cm, however the FCC requirement is that USB Dongles be treated as Portable Devices for RF Exposure because they get used with Laptop Computers. The MAXIMUM separation allowed for USB Dongles is 0.5cm in accordance with FCC KDB# 447498 (attached for your reference). This device must be tested for SAR.
B. The MPE report and the revised Users Manual 20cm statements are not appropriate for this application since they document only Mobile RF Exposure compliance for this Portable device.
C. The Radiated Emissions data in section 4.3.5 of the report, added on pages 41 of 90 through 44 of 90 (for Restricted band Spurious Emissions) do not include test setup and instrumentation setting information. There are settings documented for the radiated emissions starting on page 45 of the report, section 4.3.6. Please include the setup and instrumentation settings for the Radiated Spurious emissions for the restricted band frequencies.

Regards,
J. Sanchez
TCB Administrator
MET Laboratories, Santa Clara CA
408-207-4785 Office
408-829-1603 Cell
jsanchez@metlabs.com

Jennifer Sanchez

From: Yuan, San (Shanghai) [San.Yuan@sgs.com]
Sent: Friday, November 27, 2009 1:09 AM
To: Jennifer Sanchez
Cc: Jenn Warnell; Shawn McMillen
Subject: RE: 81956 SGS - TCB 2nd Request for additional information (CC&C Technologies, FCC ID: WKLWL6201V1)
Attachments: SHEMO09080095101 rev2.pdf; SAR report SGS_SHEMO09080095103_V1_0.pdf

Dear Jennifer:
I have update the report for the case FCC ID: WKLWL6201V1
For comment c: Please refer to the page 32 of the report SHEMO09080095101
The other report is the SAR for the product.
Please let me know if you have any problem.
Thanks for you help.

Best wishes

San Yuan
SGS-CSTC Standard Technical Services Co., Ltd
E&E EMC Lab
Tel: +86 21 6191 5653
Fax: +86 21 6191 5655
Email:san.yuan@sgs.com
Website: www.cn.sgs.com

From: Jennifer Sanchez [mailto:jsanchez@metlabs.com]
Sent: 2009年11月17日 9:10
To: Yuan, San (Shanghai)
Cc: Jenn Warnell; Jennifer Sanchez; Shawn McMillen
Subject: RE: 81956 SGS - TCB 2nd Request for additional information (CC&C Technologies, FCC ID: WKLWL6201V1)
Importance: High

Hi San,

I just wanted to follow up with the TCB request for information. Please let me know if you have any questions.

Regards,

J. Sanchez
TCB Administrator
MET Laboratories, Santa Clara CA
408-207-4785 Office
408-829-1603 Cell
jsanchez@metlabs.com