

## Daniel Park

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**To:** Joe Tobin  
**Subject:** RE: GoGo Inc. Project 13N16402 Manual user on Part 15 statement explanation from reviewer.

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**From:** Joe Tobin [mailto:JTobin@gogoair.com]  
**Sent:** Monday, January 19, 2015 9:53 AM  
**To:** Kanamatsu, Ayako  
**Cc:** Rincand, Grace; Hoque, Claire  
**Subject:** RE: GoGo Inc. Project 13N16402 Manual user on Part 15 statement explanation from reviewer.

Ayako,

The device is used exclusively on aircraft under 15.103(a).

Regards,  
Joe

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From: Kanamatsu, Ayako [mailto:[Ayako.Kanamatsu@ul.com](mailto:Ayako.Kanamatsu@ul.com)]  
Sent: Friday, January 16, 2015 8:51 PM  
To: Joe Tobin  
Cc: Rincand, Grace; Hoque, Claire  
Subject: RE: GoGo Inc. Project 13N16402 Manual user on Part 15 statement explanation from reviewer.

Hi Joe,  
I'm sorry for keep you waiting. Please read the explanation below from the reviewer.  
Let me know how I can help you.

Thank you, Ayako Kanamatsu

1. I am still waiting for the clear answer to why Part 15 statement need to be in present when you are submitting for Part 22.

<Response form the reviewer>

I am sure the device also contains digital circuitry which would make it subject to Part 15 Subpart B (verification most likely).

They can provide a statement to confirm that the manual and product label will contain the relevant statements per FCC Part 15

OR

They can explain that they are exempt from digital device requirements because the device is one of the 15.103 equipment categories.

§15.103 Exempted devices.

The following devices are subject only to the general conditions of operation in §§15.5 and 15.29 and are exempt from the specific technical standards and other requirements contained in this part. The operator of the

exempted device shall be required to stop operating the device upon a finding by the Commission or its representative that the device is causing harmful interference. Operation shall not resume until the condition causing the harmful interference has been corrected. Although not mandatory, it is strongly recommended that the manufacturer of an exempted device endeavor to have the device meet the specific technical standards in this part.

(a) A digital device utilized exclusively in any transportation vehicle including motor vehicles and aircraft.

(b) A digital device used exclusively as an electronic control or power system utilized by a public utility or in an industrial plant. The term public utility includes equipment only to the extent that it is in a dedicated building or large room owned or leased by the utility and does not extend to equipment installed in a subscriber's facility.

(c) A digital device used exclusively as industrial, commercial, or medical test equipment.

(d) A digital device utilized exclusively in an appliance, e.g., microwave oven, dishwasher, clothes dryer, air conditioner (central or window), etc.

(e) Specialized medical digital devices (generally used at the direction of or under the supervision of a licensed health care practitioner) whether used in a patient's home or a health care facility. Non-specialized medical devices, i.e., devices marketed through retail channels for use by the general public, are not exempted. This exemption also does not apply to digital devices used for record keeping or any purpose not directly connected with medical treatment.

(f) Digital devices that have a power consumption not exceeding 6 nW.

(g) Joystick controllers or similar devices, such as a mouse, used with digital devices but which contain only non-digital circuitry or a simple circuit to convert the signal to the format required (e.g., an integrated circuit for analog to digital conversion) are viewed as passive add-on devices, not themselves directly subject to the technical standards or the equipment authorization requirements.

(h) Digital devices in which both the highest frequency generated and the highest frequency used are less than 1.705 MHz and which do not operate from the AC power lines or contain provisions for operation while connected to the AC power lines. Digital devices that include, or make provision for the use of, battery eliminators, AC adaptors or battery chargers which permit operation while charging or that connect to the AC power lines indirectly, obtaining their power through another device which is connected to the AC power lines, do not fall under this exemption.

(i) Responsible parties should note that equipment containing more than one device is not exempt from the technical standards in this part unless all of the devices in the equipment meet the criteria for exemption. If only one of the included devices qualifies for exemption, the remainder of the equipment must comply with any applicable regulations. If a device performs more than one function and all of those functions do not meet the criteria for exemption, the device does not qualify for inclusion under the exemptions.

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From: Kanamatsu, Ayako  
Sent: Friday, January 16, 2015 2:44 PM  
To: 'Joe Tobin'  
Cc: Rincand, Grace; Hoque, Claire  
Subject: RE: GoGo Inc. Project 13N16402

Thank you I responded back with your response.