



Washington Laboratories, Ltd.

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November 9, 2011

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

RE: Comments of November 4, 2011
APPLICATION: ZQ3-SPS-SDMOD, Strata Proximity Systems, LLC.

Dear Mr. Fabina:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in ***bold italic***. Many responses refer you to additional exhibit(s) which has been uploaded to the application folder at the ATCB website.

Thank you for your attention. Please feel free to contact us for any additional information that you may require.

Regards,

Steven D. Koster
VP, EMC & Wireless

WLL Project: 12034

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- 1) What is your justification for not providing AC line conducted emission test results showing compliance with Section 15.207(a) of the FCC Rules? The test set up diagram in Section 2.2 of the submitted test report shows the EUT being powered from a support fixture which in turn draws its power from the AC mains. I see no battery connector or battery inside the support fixture photographs. Finally the submitted schematic diagram shows a connection in the support fixture for 120 or 240 VAC. It is possible that this device is powered by battery but I see no supporting documentation. The last sentence from paragraph c of Section 15.207 of the FCC Rules states “**Devices that include, or make provisions for, the use of battery chargers which permit operating while charging, AC adapters or battery eliminators or that connect to the AC power lines indirectly, obtaining their power through another device which is connected to the AC power lines, shall be tested to demonstrate compliance with the conducted limits.**” In my opinion, AC line conducted test results must be submitted for this device. Please comment/clarify. (I do have an interpretation that will allow you to test this device to the Class A AC line conducted emissions limits. It is the third attachment to this email).

R. AC line conducted emissions were not performed because the unit is intended to be installed on a vehicle per the installation manual and the information provided by the client. The fixture that was used was for testing purposes only.

2) Radiated emission test results in Tables 6 and 7 of the submitted test report are for 10 and 3 meter test distances respectively. Section 4.2.1 of the report does not make it clear that both distances are being used. This section only mentions a 10 meter test site. Please address.

R. Test distances clarified in the Rev 1 report.