Subject: RE: Questions Regarding FCC ID: FI5-HHR10

To: Mr. Frank Gramling/ Michelin
From: Mr. Gregory Czumak/ PCTEST TCB

RE: FCC ID: FI5-HHR10

Applicant: Michelin
Correspondence Reference Number: FI57758
Confirmation Number: 708300758-59
Dat of Original Email: September 10, 2007

Subject: Request for additional information

In regards to your recent TCB application referenced above, we kindly request that you provide the following additional information.

1. The EUT is also a personal computing device. If it is intended to be authorized under Verification as a Class A digital device, you must provide justification for the Class A rating (i.e., address its intended usage and method of marketing, showing how these will ensure that it is not used in a residential environment).

The eTire hand held reader is provided as a means to measure air pressure and temperature on commercial vehicles equipped tires with eTire sensors. The system is to be marketed only to commercial truck operations where a central tire maintenance management is used. Deployment planning calls for two units per 100 trucks assigned to a depot. The high cost of the unit (>$5000) makes it a capital asset that is important to remain on the site of commercial operations. The measurement application program automatically starts when the unit is powered on and generates a full screen display. The high rate of utilization and high cost makes the unit impractical for other than the intended use.

2. The statements required by Section 15.21, and the entire statement in 15.105 for a Class A device must be included in the user's manual. In addition, the manual must warn users of the following: in order to comply with FCC RF exposure requirements, this device must be operated such that a minimum separation distance of 20 cm is maintained between the antenna and all persons during normal operation. Please resubmit, including the required language.

An updated insert for the users manual is attached (HHR_User_Manual.doc).

3. Please provide an Operational Description for each transmitter, describing its actual RF functionality. That which was submitted is a good description of system operation, but does not address the actual RF functions of the transmitters (e.g., how power and frequency are

derived, unwanted emissions attenuated, etc.).

An updated Operational description is attached (HHR_Operational_Description.doc), which has additional details for the 433MHz transmitter. For the RFID transmitter, the AWID module User Manual is attached (AWIDUserManual.pdf). The AWID document has the details of the transmission in the 902-928MHz band. This document is filed with the FCC grant for the AWID module, FCC ID=OGSM26EA11.

4. Please address the 4 requirements of Section 15.247(a)(1) for the frequency hopping transmitter. Please include an actual example of the pseudo-random channel hopping sequence, as a part of your response.

The channel hopping sequence is now included in the Operational Description document. The AWID module is compliant with this section as stated in the Table 1 of test report f filed with FCC ID OGSM26EA11, attached (TestReport.pdf).

5. Please address Sections 15.247(g) and (h) for the frequency hopping transmitter.

As noted above, the AWID module is compliant with these sections, as stated in the Table 1 of test report f filed with FCC ID OGSM26EA11, attached (TestReport.pdf).

6. Can the EUT ever transmit while worn on the body, in a holster or other body-worn accessory? Are any such accessories made available for use with the EUT?

The HHR requires the initial sensor interrogation by selection of a software command button, with a tethered stylus. This requires the unit be held with two hands, with the display screen facing the operator. For measurements to be taken, the antenna must be held in close proximity of the tire to be measured. This precludes the possibility of operating the unit from a holster worn on the body. No holster or harness accessories are available.

The items indicated above must be submitted before processing can continue on the above referenced application.
Sincerely,

Gregory Czumak
Senior Certification Engineer
Quality Manager

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