

From: Bryan Taylor ES-Lex
Sent: Friday, February 20, 2004 11:11 AM
To: Roland Gubisch ES-Box
Cc: Thomas Eng ES-Mpk; David Schramm ES-Atl; Danielle Fontaine ES-Box
Subject: RE: TCB certification of iSECUREtrac FCC ID: OMA2250
All,

I have attached some updated documents addressing the issues below. I have also made comments below each item detailing the changes implemented.

In speaking with the client, I found that they are not manufacturing the external antenna model. I removed the references to the external antenna model in the documentation.

Regards,

Bryan

-----Original Message-----

From: Roland Gubisch ES-Box
Sent: Friday, February 13, 2004 6:55 PM
To: Bryan Taylor ES-Lex
Cc: Thomas Eng ES-Mpk; David Schramm ES-Atl; Danielle Fontaine ES-Box
Subject: TCB certification of iSECUREtrac FCC ID: OMA2250

Bryan,

Review of this application is complete and the following points are noted;

ADMINISTRATIVE

1) Request for confidentiality asks to cover internal photos, in addition to customary exhibits. Use of device justifies this request, but the letter should reference the relevant 47 CFR Rules (0.459). Please refer to the attached pro forma for an example.

The client sent a new letter which is attached.

2) Modulation designator G9W used for CDMA in Form 731 and EMC report does not agree with FCC convention of F9W; please amend.

Fixed in both places.

3) EMC test report describes EUT as "wireless desk phone." Please amend to agree with user manual.

Changed to match what appears on the users manual.

4) Please provide separate SAR setup, external and internal photo exhibits; they must be uploaded separately to FCC database. Also, both side of each PCB must be shown ; an additional photo of one side of the PCB is needed.

There is now a SAR photos document, internal photo exhibit, and external photo exhibit.

5) 2.1033(c)(8) DC voltage and current into final RF stage cannot be found; please indicate where it is found, or provide.

The CDMA module manufacturer (AnyDATA) has stated that this can be found in their users manual. I had problems getting the manual from the FCC website although it is not a confidential document. The model number of the CDMA module is DT2000DUAL. The one in the device does not have an FCCID on it.

6) 2.1033(c)(9) Tune up information cannot be found; please indicate where it is found, or provide.

It is attached.

7) PCS frequency range reported on Form 731 should represent center frequencies of lowest and highest bands, not block edges; please amend

Fixed

EMC REPORT

1) Conducted output is reported as 0.3W, yet EIRP is measured as only 16.7 mW. Please re-do and re-check reported ERP as well. Note that ERP and EIRP are usually reported on Form 731, not conducted power.

Repeated ERP/EIRP measurements on internal antenna. New data is in the report and on 731 form.

2) Spurious radiated emissions found within 20 dB of the equivalent -13 dBm limit must be measured by TIA-603 substitution method, as dBm. Please perform substitution measurements for the internal and external antenna configurations, AMPS and PCS bands, where such emissions are plotted.

This is in the report on page 26.

SAR REPORT

1) Table on p.3 reports maximum 1g SAR of 0.124 W/kg, Table on p. 16 reports maximum 1g SAR of 0.200 W/kg. Please explain difference.

Fixed the table on page 3. It was reflecting the SAR value un-extrapolated for drift.

2) Is the belt clip metallic? What spacing from the phantom does it provide? Please add these details to the test report.

Added info on the belt clip to the table on page 5.

3) Are there any battery options? Please describe.

Added info on the one battery option to the table on page 5.

4) What does the external antenna look like? Please provide a photo.

There is no external antenna model being manufactured. Removed references to the external antenna.

5) Was a duty cycle factored mathematically into the calculation of SAR?

Yes. Added a statement on this just above the data table.

6) No correlation of EIRP, ERP or conducted power is indicated in SAR report, corresponding to EMC report values; see SAR report clause 3.4.2. Please provide data showing that SAR was measured at same output power as EMC data, within 5% tolerance or as justified owing to unusual duty cycle of EUT.

Added the conducted power to the data table.

7) Test parameters for SAR plots are unreadable, owing to low resolution. Please re-submit plots with legible captions. If exhibit becomes too large (> 4 MB), consider splitting calibration data into a separate exhibit.

Increased the quality of the pdf file. In doing this I had to remove the appendix to keep the file size down. The appendix is now a separate document.

8) The plot on p.20 truncates a local maximum value; please justify, or re-scan to show complete profile.

Removed the plot on page 20. It was for the external antenna which is not being manufactured.

Certification can proceed when these issues are addressed. Thank you.

Regards,

Roland Gubisch

<< File: Confidentiality pro forma.doc >>