

Non-Conformities FCC ID: VKF-RAD87 (CKC CS Ref # E07-000096-FCC-01)

The items listed below represent requests for information following review of this application for certification under United States (FCC) regulations. . Further question may arise pending review of responses to these items.

OK	#	Non-Conformity or Comment	Submitted Response	Respondent / Date of Response
x	1	<p>The FCC logo printed in the users manual and on the label is inappropriate for this equipment. The FCC logo is reserved for equipment authorized under Declaration of Conformity; it is not a mark of compliance for the radio portion of the equipment. For more information review 15.19(a) and the following website: http://www.fcc.gov/oet/ea/Labeling_Guidelines_Parts_15_and_18.pdf</p> <p>Please remove the FCC logo from both the label and the users manual.</p>	Updated label provided.	CKC Labs 10/19/07
x	2	<p>The test report indicates on page 7 that voltage variations were measured on 802.11b mode only. Please clarify why 802.11g mode was not investigated.</p>	Updated test report provided.	CKC Labs 10/19/07
x	3	<p>The test report indicates on pages 32-34 that the resolution bandwidth used for measurement does not agree with the prescribed test procedure in KDB 558074</p>	Updated test report provided.	CKC Labs 10/19/07

x	4	The test report indicates on pages 51-52 that the spec limit is inconsistent with the 20dBc requirement. Please clarify the spec limit used.	Updated test report provided.	CKC Labs 10/19/07
x	5	The test report indicates the use of only a spectrum analyzer in the test equipment for the following tests: 15.31, 15.247(a)(2), 15.247(b), 15.247(e), 15.247(Occupied Bandwidth), 15.407(a) Occupied bandwidth, 15.407(a)(1), 15.407(a)(3), 15.407(a)(5) 15.407(a)(6), and 15.407(b). In some cases, it is clear that the cable insertion loss is unaccounted, however it is unclear for other cases. Please provide a revised test report as appropriate to accurately include all necessary insertion losses of the measurement system in accordance with ISO Guide 17025 and measurement procedures ANSI C63.4, DA02-2138 and KDB 558074.	Updated test report provided.	CKC Labs 10/19/07
x	6	Additional to item 5, on page 61 of the test report, the band edge measurements are clearly using 15.209 spec limits, however only a spectrum analyzer is listed for the test equipment. Please clarify how the test was performed. Please explain how the data represents compliance with the requisite specifications.	Updated test report provided.	CKC Labs 10/19/07
x	7	Please clarify the spec limit applied for 15.407(a)(1)	Updated test report provided.	CKC Labs 10/24/07
x	8	The test report indicates on page 77 a spec limit for spectral density which is inconsistent with the requirements	Updated test report provided.	CKC Labs 10/24/07

		of 15.407(a). Please explain and revise test report as necessary.		
x	9	Please provide demonstration of compliance for 15.407(c), “(c) The device shall automatically discontinue transmission in case of either absence of information to transmit or operational failure. These provisions are not intended to preclude the transmission of control or signalling information or the use of repetitive codes used by certain digital technologies to complete frame or burst intervals. Applicants shall include in their application for equipment authorization a description of how this requirement is met.”	The Rad-87 (device with optional radio) wirelessly transmits real-time sensor connectivity status, indicating a connect and/or disconnect state. If the device is in a failure mode then the radio power is disabled and an error message is indicated on the device display. The device does not have a powered state where no information is transmitted.	CKC Labs 10/19/07
		RF Safety concerns:		
x	10	Please clearly identify body worn accessories used with this equipment	Updated manual provided.	CKC Labs 10/24/07
x	11	Please provide users manual statements regarding user conditions for satisfying RF exposure compliance (eg, the device must be used in body worn configurations only....)	Updated manual provided.	CKC Labs 10/24/07
x	12	The RF exposure report indicates testing performed without the use of test modes. Please identify the associated equipment used for this test and declare the duty cycle	The statement listed below in black was taken from page 17 "Procedures Used to Establish Test Signal." The	CKC Labs 10/19/07

		used for measurement.	statement is not what is in the report. What is written in the report is "When test modes are not available or inappropriate for testing a device, the actual transmission is activated through a base station simulator or similar equipment." The report then states "See data pages for actual procedure used in measurement." On each of the data summary pages (pgs. 19, 20, 21), item #3 is the Test Signal Call Mode used during the test. I have checked the Test code for each of the frequencies. The requirement of the SAR test standards require the testing to be conducted at 100% duty cycle.	
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