October 17, 2016

Gregory Czumak American Telecommunications Certification Body Inc. 6731 Whittier Ave McLean, VA 22101

RE: Comments of October 10, 2016

APPLICATION: Specifi-Kali, LLC FCC ID: 2AFKF-P01 IC: Not requested

The schematic diagrams list the project as "Dog Collar" on each page (and the first page shows a connection to a GPS board) – please confirm that these are the correct schematics for the EUT.

WLL: The PWB is the same for both the collar and pointer units. In the pointer unit the GPS PWB is not connected

Section 5.1.2 of the TNB EMC report states that the "EUT uses a timed beacon with the GPS clock in order to avoid other radio transmissions." It is not clear what this means, nor how it complies with the requirement of Section 95.1307)d), which requires the EUT to be "monitoring the transmitting frequency for communications in progress", in other words, performing a listenbefore-talk function. Please clarify precisely how the EUT complies with this requirement.

WLL: Revised Test Report has been uploaded for your review

Regarding the response to comment 5, the CTS pin does not appear to be shown as an input to the Si4461_B1B-FM chip shown on p.3/18 of the schematics. Is this pin connected to the EUT's VHF antenna? Is there a separate receive-circuit for its operation? Please clarify.

WLL: Per Stephen

The microprocessor communicates with the radio through the SPI bus and also receives information from radio using interrupt pins. There are 3 radio (RF) pins attached to the main Nordic nRF51 processor (RF_IRQ_N, RF_GPIO1, RF_GPIO2). The GPIO pins are fully programmable, and they are defined to trigger when data is being received by the radio.

The SAR report assumes a separation distance of 3mm in the BLE Estimated SAR calculations – it is not clear how this value was derived. Please clarify.

WLL: SAR Lab Response:

The distance (3 mm)) is the minimum distance from the antenna's closest distance to the user.

Section 9 of the SAR report lists "N/A" for the calibration of the dielectric probe assembly. If the dielectric measurement probe is not calibrated, how do you ensure that the measured tissue parameters are correct?

WLL: SAR Lab Response:

The probe is validated prior to each measurement using air, a short and water to insure it is measuring accurately. At the completion of the pre-test validation of the probe, the tissue is then measured with the probe taking into account the measurement of air, short and water as known sources.