



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

January 15, 2009

RE: FCC ID: UAX-RPUPV1\_ATCB007192

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1 Please note that the Block diagram does not appear to be in accordance with the requirements of 2.1033. The block diagram provided only shows the 'transceiver' as a single block and does not show the data paths within the actual transceiver itself. Please remember, that it is the transceiver itself that is to be presented in block form not as a single block. I would suggest that since the schematics are a one page item and basically address all issues for a block diagram that you use the schematic as the transceiver block diagram. Please let me know if this is OK.

Response: Please use the schematic as the transceiver block diagram.

2 Please note that the external photos of the device only show the board level (module), but does not show any container in which the device is housed. The manual shows the product is in a housing and uses "Contains FCC ID:xxxxx", indicating licensed modular approval. However, the 731 form says the device is a "RoamEO PupPod GPS Pet LocationSystem" indicating the entire system including housing is the EUT. Consequently, the application information seems contradictory and confusing. If this is a modular approval, please specify.

Response: This is not a modular approval. Please refer to the revised label exhibit uploaded with this response.

3 If this is not a modular approval but is a standalone transmitter (i.e. a Location System) always inside the housing shown, please provide external photos in this condition and correct the FCC ID label information accordingly. Please confirm either way.

Response: Please refer to the revised ID label and external photograph exhibits uploaded with this response.

4 Please note that the 'rated' conducted power listed in the test report on page 1 is listed as 363mW. Please note that section 2 of the report on page 5 in the written portion says the measured power is 179mW but the table says the rated power is 179mW. Please explain and please correct all fields and statements to coincide with actual parameter and measurements.

Response: Please refer to the revised test report uploaded with this response.

5 Please note that if the measured conducted power listed in the report is 179mW as stated in section 2 of the report and if the actual rated power is 363mW as stated on page 1, then please note that this is a 3dB difference between rated and measured power. While 3dB may be allowed as a variance between erp values, this is far too great a variation between the measured and designed power levels using conducted power techniques. Please test the device within a reasonable variation of the rated power. This would be within 0.5 to 1dB.

Response: Please refer to the revised test report uploaded with this response.

6 Please note that while part 90 devices may list the rated power on a grant, this is not the case with part 95. The actual measured power must be on the grant for part 95 devices. Please correct the 731 form to show actual measured power.

Response: Please refer to the revised 731 form uploaded; please note the Grant Description should be RoamEO PupPod GPS Pet Location System.

7 The manual only appears to be pages 5 and 22 of the full manual. Please note that the FCC requires the full manual to be uploaded and not just those portions dealing with FCC statements.

Response: Please refer to the revised manual exhibits uploaded with this response.

A handwritten signature in cursive script that reads "Dennis Ward".

Dennis Ward  
<mailto:dward@AmericanTCB.com>

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Except as described in §0.459, correspondence and responses should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.