From: Monica Roos ES-STO Sent: Monday, March 19, 2007 10:16 AM

To: Roland Gubisch ES-BOX

Subject: SV: Instrumentarium/PaloDEx FCC ID: UMJ-SM certification application

Hi Roland,

- 1. Waiting for replay from Natlabs (now included in the Intertek family)
- 2. I have just recognised that there is a label inside the battery cover but since the client hadn't provide any photos without the cover I did not recognize it earlier. When receiving you remark I started to investigate this item further....

Please see photos at page 7, item 3, of the manual and a drawing of the lable inside attached. I have requested additional photos from the client showing the inside label clearly.

<< File: Corel DESIGNER 9.0 - D500440DDW-R1.pdf >>

3. Regarding the FCC-logo requirement you give me following answer earlier (13 March 2007):

Normally the FCC logo AND manufacturer's name/model number must be on the label [see 15.19(b)]. However, since the FCC ID is already there, it is probably acceptable to put the FCC logo in the user manual with the actual DoC wording. And no, you never asked about this before."

Have you reconsider this? Shall I ask the client to add the FCC-logo on the label? The label is attached on the part of the device which is outside the mouth....when you give me the answer above you had not seen the manual, just the test report, and due to that I understand if you want to reconsider your earlier answer.

4. Waiting for replay from Natlabs.

Best regards

Monica

Från: Roland Gubisch ES-BOX

Skickat: den 15 mars 2007 19:02

Till: Monica Roos ES-STO

Kopia: David Schramm ES-ATL; Terre Wolak ES-ATL

Ämne: Instrumentarium/PaloDEx FCC ID: UMJ-SM certification application

Dear Monica,

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

ADMINISTRATIVE

- 1. The User Manual lists the RF power as < 100 mW, but the test report and Form 731 report maximum power of 0.224 W conducted. If the antenna gain is < 0 dBi this is possible, but the values should be clarified or placed in agreement. (The test report lists one output power as 0.28 W; this is clearly a typo and does not need to be corrected.)
- 2. The FCC label appears to be on a removable battery cover door. Placing the FCC label on a removable part is not allowed. The applicant may re-locate the label to a non-removable part of the enclosure, or add an FCC label inside the battery compartment. Please refer to the label guidelines attached.
- 3. The device to be certified is a PC peripheral also requiring approval by DoC or certification. The DoC testing has been completed, but the required FCC logo does not appear on the label.
- 4. Devices failling under 15.247 rules must comply with RF exposure requirements. The EUT appears to be a mobile device, with the appropriate precaution in the user manual referencing a 20 cm user distance. However, there is no evidence provided to demonstrate that the device complies with the 1 mW/cm^2 MPE limit for mobile devices in this frequency band at a 20 cm diatance. Please provide an RF exposure exhibit showing that the eirp at 20 cm complies with the limit; a calculation based on conducted power and antenna gain is sufficient.

The application can proceed as soon as these issues are addressed.

Regards, Roland

<Fil: FCC labels in user accessible areas 1-16-2007.doc >>