



April 21, 2009

Rich Fabina
ATCB

RE: ATCB007518– Original Equipment Application

FCC ID: W79SQ3P0010831 for Y Soft Americas, Inc. , Response to April 20, 2009 Comments Letter

1. Please describe the signal being emitted by this transmitter during radiated emissions testing. The operational description states the carrier is full on or in high power mode for 20 Ms and in off power mode for 80 Ms. This cycle is repeated until a transponder is in the "fringe" zone when the timings change to 20 Ms to 100 Ms in high power and 80 Ms in off power mode, repeated. If the transponder is close to the Unit, the timings change to 100 Ms in high power and 320 Ms in off power mode, repeated. These short transmission durations will make maximizing emissions very difficult even if a CW emission is emitted during these time periods. [The transmitter was set to operate by the client in a continuous mode during the radiated emissions testing with a CW signal.](#)

2. The last internal photograph of the transmitter (page 5 of 5) appears to be potted because the components are not visible since they are covered with something in this photo. Please provide another photo of this board showing the components on it in accordance with Section 2.1033(b)(7) of the FCC Rules. [New photo uploaded.](#)

3. Please provide a confidentiality request letter that cites the FCC Rules for allowing such a request (See attachment entitled "ATCB-Form-FCC-Application-Letters[1].doc"). The submitted letter doesn't cite the FCC Rules that allow a request for confidentiality. [Revised Confidentiality Request uploaded.](#)

4. The AC line conducted limits shown in Table 5 of the test report for this transmitter list the Class A digital device limits from Section 15.107(b) of the FCC Rules. Unfortunately all transmitters must meet the AC line conducted limits in Section 15.207(a) of the FCC Rules. Fortunately, all the reported emissions comply with the 15.207(a) limits but the limits and margins shown in Table 5 are incorrect. Please correct the limits to those shown in Section 15.207(a) of the FCC Rules and the margins to these limits. [Report Corrected and uploaded.](#)

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5. For Your Information – The equipment class on the application form (DXT) only applies if a receiver operating between 30 and 960 MHz is contained in the same enclosure as the transmitter being Certified. The receiver associated with this transmitter operates below 30 MHz, therefore, I will be correcting the equipment class on this transmitter to DXX (Part 15 Low Power Communication Device Transmitter) before issuing the grant of Certification. Please let me know if you have any objections to this. [No objections, thank you!](#)

6. For Your Information – The operating frequency listed on the application form (126 kHz) does not agree with the operating frequency (125 kHz) listed in the user manual (page 4) and the operational description, therefore, I will be correcting the operating frequency of this transmitter to 125 kHz before issuing the grant of Certification. Please let me know if you have any objections to this. [No objections, thank you!](#)

Best Regards,

A handwritten signature in cursive script, reading "Sandi McEnery", is shown in a reddish-brown ink.

Sandi McEnery
Manager
(Agent for Y-Soft America's Inc.)