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**Sent:** Tuesday, May 01, 2012 10:18 AM  
**To:** dproulx@airpointe.com  
**Subject:** Response to Inquiry to FCC (Tracking Number 925550)

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## Office of Engineering and Technology

### Inquiry on 04/19/2012 :

#### Inquiry:

This inquiry has two related questions.

- 1) Is Part 15.231a and Part 15.231e mutually exclusive?
- 2) Can the following device be considered for compliance under 15.231a?

Device is an ACTIVE RFID TAG operating at 434MHz that is placed on assets, staff, and non-staff personnel including patients. For a tag placed on an asset, some of it's functions include theft detection of a tagged asset and real time location information of necessary tagged assets during emergency situations. For tags placed on staff and non-staff personnel, some functions include real time location information of people during emergency situations, including emergency personnel as well as non-staff and patients.

The ACTIVE RFID TAG is triggered by a motion sensor and immediatly transmits a preamble, sync signal, and ID data. The preamble is for the recieving unit to detect, followed by a sync signal, that causes the recieving unit to latch the measured signal strength, and ID Data to identify the transmitting tag. The total transmission time is following each trigger of the motion sensor is 900uSec. Following a transmission, the tag prohibits the detection of subsequent motion sensor triggers for 1.2sec. So, the tag will not transmit more than 900uSec every 1.2sec while in motion. When the tag is not in motion, indicated by no trigger detection from motion sensor, will, after 10sec, transmit for 900uSec. The tag will transmit every 10sec after the last non-triggered transmission for 900uSec when not in motion. The total non-motion transmission time over one hour is less than 350mSec. The non-motion transmissions allow the system to determine that the tags are operational and set the appropriate alerts to necessary personnel in the event the tags are not operational.

### FCC response on 05/01/2012

It is possible that a device could operate under both 15.231(a-d) and 15.231(e) if it has separate modes of operation in which one is totally under 15.231(e).

The device you describe would not comply with 15.231(a) only.

To determine compliance, each applicable rule for the rule part applied for needs to be addressed to be considered.

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