

September 8, 2022

RE: Trek Bicycle Corp – Bcycle LLC

FCC ID: 2AHXD-5267706

User Manual:

User Manual does not appear to meet the KDB 996369 D03 Sections 2.2-2.10 user manual requirements, please address accordingly;

2.3 Summarize the specific operational use conditions

Describe use conditions that are applicable to the modular transmitter, including for example any limits on antennas, etc. For example, if point-to-point antennas are used that require reduction in power or compensation for cable loss, then this information must be in the instructions. If the use condition limitations extend to professional users, then instructions must state that this information also extends to the host manufacturer's instruction manual. In addition, certain information may also be needed, such as peak gain per frequency band and minimum gain, specifically for master devices in 5 GHz DFS bands.

Trek Response: Information added to the user manual. Limited information provided because this module will only be installed by Trek in the Trek products listed in the user manual. The module is not sold or marketed to other entities.

2.7 Antennas

A list of antennas included in the application for certification must be provided in the instructions. For modular transmitters approved as limited modules, all applicable professional installer instructions must be included as part of the information to the host product manufacturer. The antenna list shall also identify the antenna types (monopole, PIFA, dipole, etc. (note that for example an "omni-directional antenna" is not considered to be a specific "antenna type")).

For situations where the host product manufacturer is responsible for an external connector, for example with an RF pin and antenna trace design, the integration instructions shall inform the installer that unique antenna connector must be used on the Part 15 authorized transmitters used in the host product. The module manufacturers shall provide a list of acceptable unique connectors.

Trek Response: Antenna information added to the user manual. The antenna is a trace on the PCB and is not user serviceable. Limited information provided because this module will only be installed by Trek in the Trek products listed in the user manual. The module is not sold or marketed to other entities.

2.9 Information on test modes and additional testing requirements⁵

Additional guidance for testing host products is given in KDB Publication 996369 D04 Module Integration Guide. Test modes should take into consideration different operational conditions for a stand-alone modular transmitter in a host, as well as for multiple simultaneously transmitting modules or other transmitters in a host product.

The grantee should provide information on how to configure test modes for host product evaluation for different operational conditions for a stand-alone modular transmitter in a host, versus with multiple, simultaneously transmitting modules or other transmitters in a host.

Grantees can increase the utility of their modular transmitters by providing special means, modes, or instructions that simulates or characterizes a connection by enabling a transmitter. This can greatly simplify a host manufacturer's determination that a module as installed in a host complies with FCC requirements.

Trek Response: This module will only be installed by Trek in the Trek products listed in the user manual, which have been tested for FCC compliance with the transmitter module installed and operating. The module is not sold or marketed to other entities. Therefore, we do not believe that this is required.

2.10 Additional testing, Part 15 Subpart B disclaimer

*The grantee should include a statement that the modular transmitter is **only** FCC authorized for the specific rule parts (i.e., FCC transmitter rules) listed on the grant, and that the host product manufacturer is responsible for compliance to any other FCC rules that apply to the host not covered by the modular transmitter grant of certification. If the grantee markets their product as being Part 15 Subpart B compliant (when it also contains unintentional-radiator digital circuitry), then the grantee shall provide a notice stating that the final host product still requires Part 15 Subpart B compliance testing with the modular transmitter installed*

Trek Response: This module will only be installed by Trek in the Trek products listed in the user manual, which have been tested for FCC compliance with the transmitter module installed and operating. The module is not sold or marketed to other entities. Therefore, we do not believe that this is required.