

Response to E05-000024-1

1. Item 1. IAW 2.1091, please provide compliance with exposure guidelines for this device by providing users with information concerning minimum separation distances from transmitting structures.

(DT) The 560T-0216 is mobile device intended for operation under Part 95 LPRS. Part 95 devices are not identified in 2.1091 and thus the regulation does not apply.

2.1091 (c) states:

"...All other mobile and unlicensed transmitting devices are categorically excluded from routine environmental evaluation for RF exposure prior to equipment authorization or use

2. Additional photos have been uploaded.

3. The 2.1055 data is in a separate report named FCC 560T 216 TempTest.

4. The correct equipment code is TNB. Please change the 731 form accordingly.

5. A revised label has been uploaded.

6. Item 6. Please provide users manual statements in accordance with 15.27. (DT) The 560T-0216 is mobile device intended for operation under Part 95 LPRS. Part 15.27 is not applicable to a Part 95 device.

7. Item 7. Please provide the appropriate disclosure statement in the user manual in accordance with 95.1015.

The following statement has been added to the user manual:

"This transmitter is authorized by rule under the Low Power Radio Service (47 C.F.R. Part 95) and must not cause harmful interference to TV reception or United States Navy SPASUR installations. You do not need an FCC license to operate this transmitter. This transmitter may only be used to provide: auditory assistance to persons with disabilities, persons who require language translation, or persons in educational settings; health care services to the ill; law enforcement tracking services under agreement with a law enforcement agency; or automated maritime telecommunications system (AMTS) network control communications. Two way voice communications and all other types of uses not mentioned above are expressly prohibited." A revised user's manual has been uploaded.

8. Item 8. Please provide the appropriate label statement in accordance with 95.1017

(DT) Due to the restricted size of the 560T-0216, we are electing to place the required statement "This device may not interfere with TV reception or Federal Government radar." in the user manual per 95.1017 (c). A copy of the updated manual has been uploaded.

9. The test report has been revised to show the antenna polarity on pages 23 and 25.

10. Item 10. The operational description states the device can be used with a larger antenna. The test report only shows test data for the whip antenna. Please explain.

Unlike CFR47 part 15.237 (e), the 216 MHz model operates under Part 95. One key difference is how the RF power limit is applied. In Part 15.237 RF output level is determined by field strength and in Part 95 it is by effective radiated power.

Our intent is to provide the small whip antenna with each unit, but little data was known as to its radiating efficiency. I deemed it important to measure the ERP of the antenna on the 560T-0216 and verify the ERP of the system. Initially our unit was adjusted to a

100mW output, and the small whip antenna was connected. Because of the type of antenna and its mounting location, a 1 dB gain was noted in one direction. Per Part 95.1013, the ERP limit is 100mW or 20 dBm so I adjusted the RF output to +19 dBm to comply with this section. All production units will be adjusted to nominal +19 dBm to ensure compliance.

We currently have not identified a large area antenna for this frequency range. Our intent is to specify a 0 dBd gain antenna similar to a dipole antenna to maintain ERP compliance. The installation team will have the flexibility to choose an antenna type as long as they take in account the antenna gain and the system is in compliance with both 95.1013 (a) (c) 1,2

Below are what I believe to be the applicable regulations:

§95.639 Maximum transmitter power

(e) The maximum transmitter output power authorized for LPRS stations is 100 mW.

§95.1013 Antennas

(a) The maximum allowable ERP for a station in the LPRS other than an AMTS station is 100 mW. The maximum allowable ERP for an AMTS station in the LPRS is 1 W, so long as emissions are attenuated, in accordance with §80.211 of this chapter, at the band edges.

(c) Antennas used with LPRS units must comply with the following:

(1) For LPRS units operating entirely within an enclosed structure, e.g., a building, there is no limit on antenna height;

(2) For LPRS units not operating entirely within an enclosed structure, the tip of the antenna shall not exceed 30.5 meters (100 feet) above ground. In cases where harmful interference occurs the FCC may require that the antenna height be reduced; and

(3) The height limitation in paragraph (c)(2) of this section does not apply to LPRS units in which the antenna is an integral part of the unit."