

RE: Lear Corporation
FCC ID: KOBXU18A
IC: 3521A-JXU18A
ATCB020799

The following is in response to the comments made on FCC portion of the above referenced application.

Please note that UWB devices require the TCB to submit a request for Pre-Approval Guidance (PAG) to the FCC before the application may be granted. Regarding the demonstration of compliance with Section 15.519(d), for the past year, the FCC has been requiring that the information (re horizontal and vertical polarizations) and 2 plots, specified below, be included in the reports for all UWB devices. They have also stated that the refusal to include this info and these plots would likely result in a pre-grant sample request for testing at the FCC. The following text is taken from an email from the FCC. Please provide the info and plots, as requested by the FCC.

There is no indication that the device was tested with the receive antenna at a polarization of horizontal or vertical. The FCC recommends that the procedure to test this strict rule part, part 15.509, should be followed as indicated below in order to show compliance to the federal code of regulations.

This is a recommended manner in which to test the strict requirement as defined in part 15.509(e).

1. Configure the unit under test according to ANSI C63.4.
2. Provide power to the unit under test and supporting hardware.
3. Rotate the unit under test and supporting hardware 360 degrees to determine the position of the worst case radiated emission.
4. The height of the broadband receiving antenna should be varied between 1 meter and 4 meters.
5. For each suspicious radiated emission, move the receiving antenna between 1 meter and 4 meters and then rotate the turn table between 0 and 360 degrees.
6. The measured maximum radiated emissions should be measured with a Spectrum analyzer using an RMS detector. The RBW of 1 kHz and VBW of 1 kHz with a 1 msec averaging time is recommended for this measurement.

The Spectrum Analyzer is recommended to be set to:

Frequencies = 1164 MHz - 1240 MHz and 1559 MHz - 1610 MHz

RWB = 1 kHz

VBW = 1 kHz or 3 kHz (VBW greater than or equal to RWB)

Detector set at RMS or average (it is recommended to be set at RMS)

Span = auto

Response:

The test report has been updated to include plots of the emissions collected in the GPS restricted emissions bands. These are max held plots of peak emissions when the EUT is rotated through all orientations with respect to the test antenna.