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To: Greg Czumak, FCC Application Processing Branch
From: S. S. Liou, Electronics Testing Center Taiwan
Re: FCC ID N8TSOV222

Applicant: Sovereign Technologies Corporation

Correspondence Reference Number: 5977

731 Confirmation Number: EA92460

Dear Sir:

It is very appreciated for your kindly reviewing our application. Your questions and the responses are stated in the following.

Q1. A full description of how and when the EUT transmit.

Answer: The EUT will transmit under 3 conditions:

- (a) The EUT will transmit a normal code (200ms) when an infant (for IMTS) or an asset (for ATS) is moved or has motion.
- (b) The EUT will automatically transmit a normal code (200ms) on periodic time intervals longer than 60 minutes.
- (c) The EUT will transmit an emergency code if the ATS transmitter is removed from the asset or if the ankle cut-band strap of IMTS is cut, broken, or torn free from the transmitter unit.

The details of the transmission under emergency condition are described in the following:

A 630ms pulse train is composed by 9 frames of 70ms code string. When emergency condition happens, the EUT will transmit six times of the pulse train separated by five 20 seconds long silent periods. Please refer to the attached page.

Q2. How does the computer track movements?

Answer: The signal emitted from the EUT will be received by 3 receivers placed in 3 different locations. According to the signal strength received, the location of the EUT can be determined.

Q3. What constitutes an alarm condition?

Answer: Please refer to item (c) of the answer for Q1.

Q4. The EUT may be used in asset tracking. This violates Section 15.231(a)(3).

Answer: Please refer to the item (c) of the answer for Q1. The EUT used in asset tracking comply with Section 15.231(e). The test data and the limit of Section 15.231(e) for radiated emission test are attached in the following page

3.3 Test Data**A. ATS**

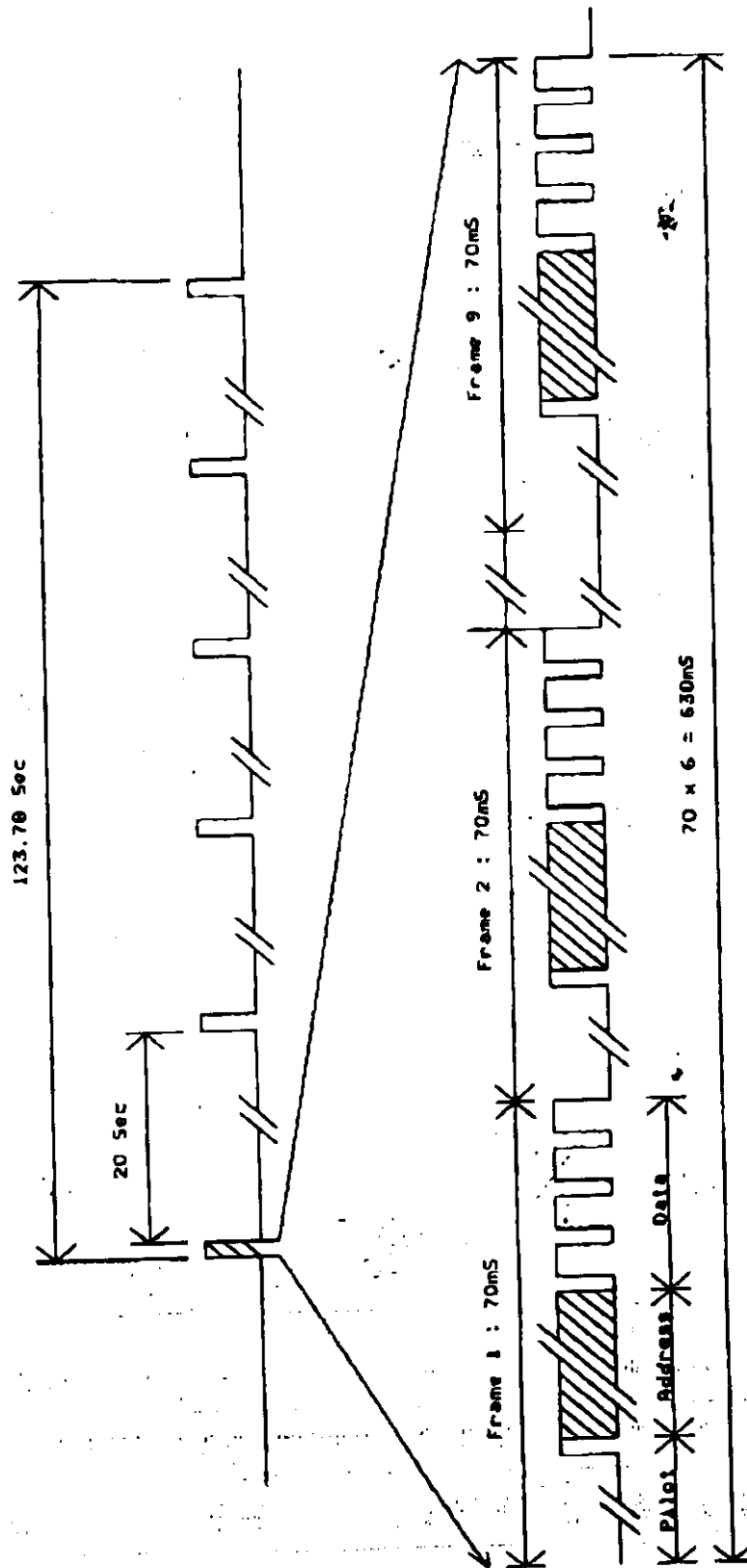
Temperature : 26 °C
 Humidity : 60 %
 Operated mode : Transmitting
 Test Date : OCT. 13, 1998

Frequency (MHz)	Ant Pol H/V	Reading (dBuV) Peak	Factor (dB)		Result @3m (dBuV/m)		Limit @3m (dBuV/m)		Margin (dB)	Table Degree (Deg.)	Ant. High (m)
			C	D	Peak	Ave.	Peak	Ave.			
418.092	V	80.4	-5.7	-4.3	74.7	70.4	92.3	72.3	-1.9	0	1.00
836.142	V	50.9	1.8	-4.3	52.7	48.4	72.3	52.3	-3.9	90	1.50
1254.085	V	42.2	-8.6	-4.3	33.6	29.3	72.3	52.3	-23.0	0	1.30
1672.113	V	42.0	-6.5	-4.3	35.5	39.8	72.3	52.3	-12.5	0	1.30
2090.460	H/V	---	-4.3	-4.3	---	---	72.3	52.3	---	---	---
2508.552	H/V	---	-2.7	-4.3	---	---	72.3	52.3	---	---	---
2926.644	H/V	---	-1.4	-4.3	---	---	72.3	52.3	---	---	---
3344.736	H/V	---	-0.4	-4.3	---	---	72.3	52.3	---	---	---
3762.828	H/V	---	1.1	-4.3	---	---	72.3	52.3	---	---	---
4180.920	H/V	---	2.0	-4.3	---	---	72.3	52.3	---	---	---

Note :

1. Factor C means "corrected", and that includes antenna factor, cable loss, amplifier gain (if any). And Factor D means "Duty", that is for calculating the average value and derived from section 3.6 in this test report.
2. Result = Reading + C. Factor
Ave. = Peak Value + D Factor
3. "*" means the frequency fall in the restricted frequency band, and the limit of emission is referred to FCC class B
4. The limit for spurious emissions refers to FCC §15.231(e).

If the measured frequencies fall in the restricted frequency band, the limit employed is § 15.209 general requirement when frequencies are below or equal to 1 GHz. And the measuring instrument is set to quasi peak detector function, no duty factor applied.



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Date: March 5, 1999 Sheet of

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¥D!@:

To: Will Yauo, Electronics Testing Center Taiwan
From: Greg Czumak
gczumak@fcc.gov
FCC Application Processing Branch

Re: FCC ID N8TSOV222 
Applicant: Sovereign Technologies Corporation
Correspondence Reference Number: 5977
731 Confirmation Number: EA92460
Date of Original E-Mail: 02/08/1999

1. Please provide a full description of how and when the EUT transmits. How does the computer track movement? The manual states that the EUT may be used in asset tracking. This does not constitute safety of life. As such, the EUT may not transmit at the predetermined interval of just over 60 minutes, as this violates Section 15.231(a)(3).

2. What constitutes an alarm condition? Because the EUT is intended to be used for purposes other than safety of life, it may not transmit continuously during an alarm condition.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal pursuant to Section 2.917 (c) and forfeiture of the filing fee pursuant to section 1.1106.

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Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.