

From: Nicholas Abbondante ITS/ES-Box
Sent: Thursday, November 08, 2001 10:36 AM
To: Roland Gubisch ITS/ES-Box
Cc: Scott Lambert ITS/ES-Box; Danielle Gravelle ITS/ES-Box
Subject: RE: BodyMedia FCC ID: PV8-909902G01REVD
answers interspersed.

-----Original Message-----

From: Roland Gubisch ITS/ES-Box
Sent: Tuesday, November 06, 2001 6:35 PM
To: Nicholas Abbondante ITS/ES-Box
Cc: Scott Lambert ITS/ES-Box; Danielle Gravelle ITS/ES-Box
Subject: BodyMedia FCC ID: PV8-909902G01REVD

Nick:

Technical review of this application for the "base" or "cradle" is complete, and we note the following:

1) I cannot find a letter from the client designating the confidential exhibits, and justifying them. Please point me to it, or provide.

No confidentiality requested. Form 731 already reflects this.

2) The device has a short-form FCC ID label. Its use is justified, but the 15.19(a)(3) text normally included in the label must then appear in the user manual verbatim. I cannot find the text anywhere. Somewhat similar text occurs on p.46, but that is not sufficient. The text of 15.19(a)(3) should probably be located on p. 46. The statement needs to be included only once, covering both the monitor and the base.

Review manual page 48 and let me know if the text there is acceptable. Also, I believe it is best for us to double certify this device to preserve the labelling. I am preparing a second form731 for you to include in the file. exhibits will not be supplied as they would duplicate those already on file.

3) This device is both a transmitter and a PC peripheral, and thus a composite device (subject to two or more different FCC rules). As a transmitter, it must be certified. As a PC peripheral, it may be approved either by Declaration of Conformity or Certification.

If DoC were selected, then the device label would have to bear both the FCC ID number and the DoC logo. If certification were selected, then the base must be certified twice, once as a transmitter and once as a PC peripheral - but there would be only one FCC ID number and no DoC logo on the label. As the label artwork is already prepared, it appears that the latter approach is better. Please comment.

See above.

4) The configuration photos for the cradle testing appear to show the armband in place. That is not the EUT, and should not be included, unless it is also the worst-case configuration diagram for the cradle. Also, the armband does not appear in the test report block diagram. Please comment.

I will amend the block diagram. The armband was in place to exercise the transmit and receive functions of the cradle. The armband was also used during line-conducted emissions testing to provide a load for the charging function of the cradle.

5) The configuration photos appear to show only one LISN used for the line conducted testing. Only one LISN is shown in the equipment list. ANSI procedures specify two LISNs for conducted emissions. Please comment.

Testing was performed with one LISN. If this fact will prevent acceptance of this device for a grant of certification, I will contact the client to arrange for a re-test. If I run the test with both LISNS and show that the results are similar or at least not failing, would you then recommend that I amend the test report with the newest line-conducted data, or would you then find that acceptable evidence to grant without an amendment. I could certainly provide a miscellaneous exhibit showing the test results, test setup photos, and test equipment if necessary to back up this decision.

6) The cradle should have been tested per 15.33 to the 10th harmonic, or 9.16 GHz. The test report does not appear to reflect that this was done. Specific supporting text should be added, unless already in place.

The radiated emissions scan was performed to ~9.5 GHz. No emissions of note were detected. I will amend the report and resubmit to reflect the full test range.

7) It is not clear how the armband emissions were separated from the base emissions during testing, as both are transmitters. Please comment.

The configuration of the units had the armband talking 50% of the time and the cradle talking 50% of the time. This effectively exercises both the transmit and receive modes of both devices simultaneously.

Roland