

Response for Request for information for

Re: FCC ID: QLBPTSS2003
Applicant: Pegasus Technologies, Inc.
Correspondence Reference Number: N/A
731 Confirmation Number: N/A

- 1.) The device appears to always start at the frequency in the hop table. I can understand the pseudo random approach once started, but how does the device meet the pseudo random requirement of the start frequency? Is the last hop frequency always the same thus causing a potential random sequencing concern? Please explain.

The hop table is a pseudo-random list of frequencies. The device always transmits on the "next" frequency in its hop table. Each frequency will be used as packets are transmitted. After a sequence of communication is complete the transmitter still remembers the pointer into its hop table. The next series of communication will commence on the next hop frequency. Thus, the starting frequency is pseudo-randomly selected and the use of each frequency is statistically equal.

- 2.) Please note that the manual states, "...20cm (8 inches) from all persons (not including arms and hands)... Please note that the extremities apply to hands, feet, wrists, etc . The fleshy part of the arm may not fit the extremity definition. Please clarify the manual to say "not including hands and wrist" or some other similar statement that does not bring question as to the body separation distance.

The manual has been revised to read: " ...(not including hands, wrists, feet, and ankles) "

- 3.) What type of products is this intended to be used in and how does the manufacturer intend to prevent use in portable devices?

The device is marketed and intended for industrial operation as a mobile or fixed device. As is stated in the manual it may only be used in installations where the antenna is a least 20 cm from the body of the user (not including hands and wrist). Please refer to the updated manual.

- 4.) Please note, "Test photographs were found to be corrupted and could not be provided" is not an acceptable reason for not providing setup photos. Please provide the necessary setup photos for radiated emissions, or please provide adequate reasons for not providing these photos.

New photographs have been taken and added to the report.

- 5.) Section 2.6 of the report lists 2 antennae, yet table 1a only shows one. Please explain.

From our earlier email, we informed you that Pegasus was testing an additional antenna and had hoped to have this data to you. However the manufacturer has decided to pursue this antenna as a permissive change at a later date. Therefore the affected pages of the report have been changed. Only one antenna is currently being approved

- 6.) While not significantly affecting the results, your emissions calculations in the spurious emissions tables do not appear to be correct. Please verify and show a sample formula that you used in your calculation.

The calculations appear to be off slightly because the calculation program actually interpolates the correction factors to several decimal places. Because all correction factors are listed independently and each one is rounded or truncated for purposes of listing in the table, the errors due to the rounding and truncating compound. This causes a slight variance when hand calculating the numbers shown vs the calculation program. This variance is typically on the order of 0.1 dB or less, with rare instances of 0.2 – 0.3 dB variances. Because of the interpolation of the numbers, we consider the numbers originally calculated as correct. Please note that the FCC has never had a problem accepting this fact.

- 7.) Please note that while you state no emissions were found within 10dB of the FCC limit, you have not stated if this is average or peak readings. Please verify that the average limits above 1GHz and the defacto peak limits above 1 GHz has been met.

This fact is in reference to both the Peak and Average limits above 1 GHz.

- 8.) Please note that you have not specified the antenna used in your OATS emissions radiated spurious testing. Please verify that you have tested both and that both antennae are compliant for radiated emissions testing.

As given in 5) above, Pegasus is only pursuing 1 Antenna at this time. Appropriate information has been changed in the report.