

From: "Randal Clark" <randy.clark@ckccertification.com>  [Add to Address Book](#)
To: monikabrandle@yahoo.com
Subject: FW: Non-Conformities FCC ID: RKYOM-1 (Ref # E04-000018-1)
Date: Tue, 9 Mar 2004 13:31:24 -0800

FYI...

Randal Clark
Evaluation Engineer

CKC Certification Services
4933 Sierra Pines Dr.
Mariposa, CA 95338
Phone: (209) 742-2378
Fax: (209) 966-0857
Email: randy.clark@ckccertification.com

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<http://www.ckc.com/ckcs.htm> for more information.

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

From: James Bare [mailto:rifetech@rifetechnologies.com]
Sent: Monday, March 08, 2004 8:57 PM
To: Randal Clark
Subject: RE: Non-Conformities FCC ID: RKYOM-1 (Ref # E04-000018-1)

Randy,

Thanks for looking into this for me. Will contact Analab tomorrow about
the problem.

In the meantime here is what I've done about the deficiencies.

>Item 1. Please provide a revised confidentiality letter. Photos can
>not be kept confidential, the letter must be signed and the date must
>be current.

Have made one up with new date, removed the words "pictures", and
signed. Sent to your attention, also uploaded unsigned version to your
web site .

>Item 3. Please provide a revised user manual showing compliance to
>§18.213.

I checked this and it seemed OK, did resend. Compliance info is at very
end of the user manual. Wonder if she was looking at the wrong file ?

>Item 5. Please provide a block diagram.

Did forget this, made one up and sent to web site tonight.
>

>Item 6. Please provide a separate file for test set-up photos.

Placed all set up photos into one PDF file and sent this afternoon.

If there are any problems with these items, please let me know!

If for some reason I need to have a partial test done at Analab for frequencies down to 20 MHz will there be any problems with accepting the data? I would think an entirely new report would have to be written including the new test data?

Jim

>Regarding the question on Loop antennae, this question refers to the
>use of a loop antenna for radiated measurements below 30MHz as
>specified in ANSI C63.4 2000. The FCC has recently announced that
they

>will not accept the use of Rod type antennae (including bicon or bilog
>type) anywhere in this frequency range, despite earlier discussions of
>allowing biconical antenna measurements within the range of 25-30MHz.
>

>The question stems from the test report from Analab, they claim that
>the testing was performed from 20-400MHz, however they do not list for
>their test equipment a magnetic loop antenna. You should contact the
>testing laboratory and obtain clarification of the testing performed.
>When following the procedures listed in ANSI C63.4, a shielded
balanced

>magnetic loop antenna should be used. Alternatively when following
the

>procedures listed in FCC MP-5, within the frequency range of 18 to 30
>MHz, a shielded balanced loop or calibrated tuned half-wave dipole is
>acceptable. Analab lists both of these measurement procedures in the
>test report, however do not provide adequate documentation to
>substantiate the claim.
>

>Please feel free to contact me if you have any further questions
>regarding these issues.
>

>All Best,

>

>Randal Clark

>Evaluation Engineer

>

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><http://www.ckc.com/ckccs.htm> for more information.
>
>
>-----Original Message-----
>From: James Bare [mailto:rifetech@rifetechnologies.com]
>Sent: Sunday, March 07, 2004 10:20 PM
>To: info@ckccertification.com
>Subject: Re: Non-Conformities FCC ID: RKYOM-1 (Ref # E04-000018-1)
>
>
>Hello,
>
>Will be happy to provide the following requests. Could you please
>clarify a few points for me?
>
>
>>The following items need to be provided before the evaluation for
>>certification can be completed. If you have any questions please do
>>not hesitate to contact CKC Certification Services at
>>info@ckccertifications.com.
>>
>>Item 1. Please provide a revised confidentiality letter. Photos can
>>not be kept confidential, the letter must be signed and the date must
>>be current.
>
>I would therefore assume that if the material requested to be kept
>confidential is placed in a MS word document file instead of a jpg
>picture, that this would comply with FCC guidelines? If so will revise
>to comply. Please let me know! Will send you a signed copy of letter
>with appropriate revisions.
>
>>Item 2. Please provide a signed copy of the CKC General Agreement
>>Letter.
>
>You should have this, will provide my copy.
>>
>>Item 3. Please provide a revised user manual showing compliance to
>>§18.213.
>
>Wasn't this placed at the end of the user manual? Will check the file
I
>sent you. May have sent you an early version of the manual.
>
>>Item 4. The FCC requires the use of a loop antenna below 30MHz,
please
>>explain.
>
>Not certain what you mean. Do you mean for emission testing purposes
or
>for usage purposes ? If for usage purposes, loop antennas may or may
>not be necessary. For example.
>
>Diathermy device - loop
>Induction heater or welder - loop
>Laser driver - non loop, direct attachment fired through electrodes.
RF
>pulsed field therapeutic device - gas plasma tube. Tubes are fired

>through internal electrodes necessitating no loop, just direct
>attachment to the electrodes.
>
>Maybe think in terms of the electrode fired tubes being akin to a
>dipole? It is possible to light laser tubes and plasma tubes using
>capacitive coupling wherein the tube is wrapped (a loop on each end
>).

>Can provide pictures of this if required. Laser tubes however don't
>tend to lase when wrapped in this manner. Sure do glow brightly
though!
>
>>
>>Item 5. Please provide a block diagram.
>
>Oops! Did forget to do this.Did send separate pictures of the various
>sections.
>>
>>Item 6. Please provide a separate file for test set-up photos.
>
>Odd, I was told that the pictures had to be separate. Actually had
them
>all in one file originally for submission. Will place into one file.
>
>James Bare
>
>§ 18.213 Information to the user.
>Information on the following matters
>shall be provided to the user in the in-struction
>>manual or on the packaging
>if an instruction manual is not pro-vided
>for any type of ISM equipment:
>(a) The interference potential of the
>device or system
>(b) Maintenance of the system
>(c) Simple measures that can be
>taken by the user to correct inter-ference.
>[50 FR 36069, Sept. 5, 1985, as amended at 51
>FR 17970, May 16, 1986]