

MPE Calculation: The MPE calculation is based upon a power of 41.76dBm. However, this number does not appear in the test report and it is lower than the highest reported measured power.

The MPE calculation provided in the RF exposure statement is based upon the theoretical 15W maximum power rating. As this is a mobile device the final RF exposure is handled at the time of licensing based upon the antenna gain. The difference of 0.2 dB between the theoretical power and measured power is well within the measurement uncertainty of test equipment.

Test Report:

The Form 731 lists three different types of modulations used: 11K0F3E, 11K2F1D, and 11K2F2D. The test report is not specific which modulation was used for evaluation. Please clarify.

All three emissions designators use FM, require the same necessary bandwidth, and use the same emission mask. Testing was performed on F3E.

Page 1 of 37: This page states that the radio tested was the TK-981-1 and that "The results presented in this report relate only to the item tested." In the user manual, there are several radios listed: TK-780, TK-780H, TK-880, TK880H, TK-980, TK-981. Are all of these radios to be covered under the same FCC ID number: ALH245700?

The instruction manual is for several models of radios that have the same form factor and user interface. This manual covers several different FCC IDs.

Page 4 of 37: 891 – 901 MHz, 935 – 940 MHz is listed as the radio operation range. Is this a typo?

Yes this a typo and has been corrected.

Page 8 of 37: The text references a 100 kHz RBW for all spurious measurements. Is may just be a typo. Was a notch filter used between the EUT and the spectrum analyzer or an attenuator? The text states a notch filter but the spectrum analyzer plots have a 40 dB offset suggesting perhaps an attenuator was used.

Both an attenuator and tunable notch filter were used. The transmitter is 15 W so at maximum power the attenuator lowers the power to a safe level for measurement but is still high enough place the spectrum analyzer into compressions causing "ghost harmonics" which can only be eliminated with the further suppressions of the fundamental frequency with a notch filter. This will allow for accurate measurement of any real conducted spurious products of the radio. The block diagram in the test report has been edited to include both components.

Internal photos seem to be a little blurry. Can these be retaken and resubmitted?

Photos would have to come from Japan and would be difficult to obtain. There only seems to be one photo that is a little hazy but it's not extreme. Is there any way we can proceed with what's already been submitted?

Jennifer Sanchez

From: Sandy Valentine [sandyv@mflom.com]
Sent: Wednesday, June 24, 2009 8:30 AM
To: Jennifer Sanchez
Subject: re: 81656 Compliance Testing - 2nd TCB Request for additional information for Kenwood USA, FCC ID: ALH245700, IC: 282D-245700 (p0940014)
Attachments: d0950012.FCC.Certification.Part 90_Rev 4.0.pdf; IC Application & Annex Rev3.pdf

Hello Jennifer:

Please see response to RT below.

Sandy Valentine

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

From: "Jennifer Sanchez" <jsanchez@metlabs.com>
To: "Sandy Valentine" <sandyv@mflom.com>
Date: Tue, 23 Jun 2009 16:43:23 -0700
Subject: **81656 Compliance Testing - 2nd TCB Request for additional information for Kenwood USA, FCC ID: ALH245700, IC: 282D-245700 (p0940014)**

Hi Sandy,

Please see the reviewer's additional comments below:

1. On the Industry Canada application, Field Strength is listed as 41.97dBm. This seems to be a bit high. Please verify that the units are correct. If this is a Field Strength, at what distance was it measured?
[The IC application has been edited accordingly.](#)
2. On the Industry Canada application, please check the Transmitter and Receiver Spurious. These units do not appear to be correct.
[The transmitter and receiver spurious are correct. The transmitter is tested radiated at 3 m and the receiver is tested conducted in accordance with RSS GEN Rule 6b.](#)
3. On the Industry Canada application and on the Form 731, the emissions designators are listed as: 11K0F3E, 11K2F1D, 11K2F2D. In the test report, they are listed as 11K0F3E, 11K2F3D, 11K2F2D.
[The test report has been edited accordingly.](#)
4. Under Section 90.212 of the FCC Part 90, does the EUT employ the use of any scrambling devices, and if so, does it meet the requirements of 90.212(d) for Station Identification?

6/24/2009

No, the unit does not employ a scrambler.

5. According to the test report, the TK-981-1 model was tested. Does this particular model operate at both the 896-901 MHz and the 935-940 MHz band?

Yes, it uses both bands.

If you have any questions or concerns, please let me know.

Thanks!

J. Sanchez

TCB Administrator

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