

April 7, 2021

RE: KINEXON, Inc.

FCC ID: 2ALC5-KNX-VTAG1

IC: 25557-KNXVTAG1

ATCB026637

After a review of the submitted information, I have a few comments regarding the above referenced Application. Depending on your responses, please note that there may be additional questions.

Pursuant Section 15.103(a), digital devices used exclusively on transportation vehicles (which includes forklifts and other vehicles designed to transport people or goods) are exempt from authorization requirements, and are only subject to the general non-interference requirements to which all Part 15 devices are subject. As a result, certification or SDoC would not be an option for an exempted device. In light of this, the Part 15B EMC test report submitted has not yet been reviewed. Please confirm if the EUT will be used exclusively on transportation vehicles or not. If so, then there would be no JAB submittal, and the EUT will only be subject to certification as a UWB transmitter (not a composite device). But, if the EUT may be used in any manner when not installed on a vehicle, then it may (must) obtain certification (or SDoC) as a JAB (I note that the UWB EMC report includes AC line conducted (AClc) data, implying potential non-vehicular usage). In this case, please revise the Operational Description to also describe the non-vehicular usage scenario, and I will then also review the Part 15B test report. (see comment 9a, below).

CSA: Acc. to our client's information the Vehicle Tag is typically used on moving vehicles, where it is powered by the power supply of the vehicle. However, in selected use cases, it could also be mounted on large, moving machinery. Imagine a conveyor system on an assembly line with moving parts which may be tracked with the vehicle tags. In that case, the vehicle tag may indirectly be connected to the power grid.