
发件人: oetech@fcc.gov <oetech@fcc.gov>
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收件人: Zhang, Wade (shanghai) <Wade.Zhang@sgs.com>
主题: [EXTERNAL] Response to Inquiry to FCC (Tracking Number 705217)

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Inquiry on 01/29/2022 :

Inquiry:

Dear Sir,

We have a UWB robot dog with a UWB label controller need apply for FCC ID, According to KDB 388624 D02 Ultrawideband devices operation under Part 15 Subpart F need Pre-Approval by your side, please help kindly give your advise.

- 1: The applicant not defined their product as a toy, also not defined as a indoor use only;
- 2: The remote control can control the robot dog's accompaniment, or manual control the robot dog.

Could you help confirm if 15.519 applicable for Robot dog and Label controller?

Thanks so much.

FCC response on 02/02/2022

We will need additional information before we can respond. Please provide a complete operational description. Why is this not classified as a toy? What is the function of the robot dog? Is the UWB component intended to provide motion guidance? If so, are any external infrastructure, such as anchors, required? Please explain what is meant by "control the robot dog's accompaniment"? What is a "Label controller"?

---Reply from Customer on 02/02/2022---

Dear Sir,

Thanks for your quickly response, the product manual have a statement "This product is not a toy and is not suitable for people under the age of 18. Do not allow children to come into contact with this product." the product not have any external infratructure, and the robot dog can follow the people who have a UWB lable controller, we have a product manual for you reference, please help give more advise, thanks.

---Reply from Customer on 02/11/2022---

Dear Sir,

Did you check the manual of this Robot dog? Do you need more information?

Thanks a lot.

FCC response on 02/16/2022

Can you verify that the UWB link will be peer-to-peer for the purposes of two-way ranging via time-of-flight measurements? Also, please explain how the 15.519(a)(1) requirement (see below) will be satisfied.

15.519(a)(1) A UWB device operating under the provisions of this section shall transmit only when it is sending information to an associated receiver. The UWB intentional radiator shall cease transmission within 10 seconds unless it receives an acknowledgement from the associated receiver that its transmission is being received. An acknowledgment of reception must continue to be received by the UWB intentional radiator at least every 10 seconds or the UWB device must cease transmitting.

---Reply from Customer on 02/18/2022---

Dear Sir:

Yes, The EUT measure the distance by time-of-flight and determine the distance by measuring the time of the Poll information and the Response information, transmitting and receiving data are peer-to-peer.

UWB two parties (Robot dog and label controller) will not transmit information before establishing a connection. After the receiver returns an acknowledgment, UWB continues to communicate to measure the distance. If one party cannot receive information within tens of milliseconds, the UWB communication is interrupted, and the transmitter will send a sniffing signal to try to re-establish the connection.

So, can 15.519 suitable for this device?

Hope this clearly for you and waiting for your advice.

FCC response on 02/22/2022

Aside from the statement in the user's manual, can you please explain how this product will be

marketed so as to prevent it from being sold as a toy?

---Reply from Customer on 02/24/2022---

Dear Sir,

As the toy defined as any object designed, manufactured, or marketed as a plaything for children under 14 years of age. The manufacturer will paste an obvious notice label like "only use for 14 years age+" on the EUT, and the product will sell in their online store, they will have a warning like "Please make sure the user is over 14 years old before you purchase" on the purchase process, informing the end users who need 14 years age+.

Can this accept by FCC? And please give advice can we certify it use 15.519 or other section?

Thanks a lot.

FCC response on 02/28/2022

After much consideration we have determined that the subject application may seek authorization under the 15.519 rules under the following additional requirements:

1. Inclusion of a statement in the users manual, on the packaging, and in any online or other description of the product stating that "**This product is not a toy**". Do not specify any age limitations since the FCC has not made a correlation between age and toys in its rules.

2. The following conditions must be specified in the Grant notes:

Antennas mounted on outdoor structures, such as antennas mounted on the outside of a building or on a telephone pole, or any fixed outdoors infrastructure are prohibited for use with this device.

This device shall not be marketed or sold as a toy.

This device cannot be used onboard any aircraft or ship.

Attachment Details:

[UWB Chip Specification](#)

[Product user manual](#)

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.