



Elliott Laboratories Inc.
www.elliottlabs.com

684 West Maude Avenue
Sunnyvale, CA 94085-3518

408-245-7800 Phone
408-245-3499 Fax

May 17, 2004

Mr. Tim Johnson
American Telecommunication Certification Body
6731 Whittier Ave
McLean, VA 22101

Subject: Savi Technology FCCID: KL7-650MR-V2

Dear Tim,

Thank you for your comments dated May 6, 2004 concerning the certification of the subject product. Please review our responses, which follow your comments as reproduced below.

1) The 433 MHz test photos show the device with the antenna lying down. The antenna should have been positioned in an upright position for the test. Recent interpretations from the FCC have stressed this fact. Note the report mentions all 3 axis. Please confirm this was performed and if so, are additional photos available.

We confirm that all three axis were investigated as noted in the test data. No photos were taken of the other axis.

2) The test report justifies the use of previous data for the 123 kHz from a previous model. However, the previous model did not contain the 433 MHz antenna. Additionally, from the schematics both the 433 MHz and 123 MHz antennas in this model are fed from a single feed point without any selective switch for which antenna should be used for a particular TX cycle. The addition of this circuitry changes the loading conditions of the antenna and will likely have an affect on the previous test results at 123 kHz. Due to the changes of loading conditions it would seem that that the validity of the previous test results cannot be assumed.

The previous model is identical to the model submitted. The schematics show that the 433.92 MHz transmitter is separate from the 123 kHz transmitter. For this model, instead of using the UHF loop antenna shown on the reader schematics for the 433.92 MHz transmitter, the external antenna is connected to J1, J5 and J22 through L1, L2 and C1 as shown in the antenna schematic.

3) Please explain what is meant on page 2 of 9 when the report states "when operated under 15.209 rules, 433.92 MHz transmission may be continuous. Shouldn't all 433.92 MHz emissions be classified under 15.231 (a) & (e) and non-continuous in nature?"

This statement applied to the previous model to which this data applies, since we did not retest the 123 kHz transmitter but needed to include the data for a complete record. However, the -21x models that this application is for do not have 15.209 UHF transmissions. See page 8 of 19 of the report.

4) Page 9 of 19 mentions no modifications necessary, but modifications appear to be listed throughout the report. Please clarify.

The modifications referred to in the report pages were performed on the previous model since we included the test data for the previous model for a complete record on the new model with the external UHF antenna. No modifications were made to the -21x model that was tested.

5) Please provide test measurements to show the 24% and 10% duty factors, as well as compliance to the 5 second automatic shut off and 30*/10 second repetition rate requirements of 15.231

See the attached plots that we neglected to provide with this new application. They were part of the original model application and should have been sent.

I hope this answers all of your questions.

Sincerely,

A handwritten signature in black ink, reading "David W. Bare". The signature is written in a cursive, flowing style.

David W. Bare
Chief Technical Officer