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June 6, 2018

Gregory Czumak
American Certification Body Inc.
6731 Whittier Ave
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RE: Comments of June 05, 2018
APPLICATION: SRC, Inc. – Gryphon Sensors
FCC ID: 2APK5-R1400
IC ID: N/A

2. The Confidentiality Request includes a request for permanent confidentiality for the Internal Photos and the User's Manual. Pursuant to KDB 726920)II)3) (see attached document), this may only be done if the EUT is always sold under an NDA that restricts the disclosure of the proprietary information. Please submit the descriptions, attestation, and the sample NDA specified in section II)3)c) of the referenced KDB Publication, justifying the request for permanent confidential treatment of the Internal Photos and User's Manual. Please note that the NDA must specifically cite the need to maintain the confidentiality of the Internal Photos and User's Manual. Please address.

R. Per customer: The circuit cards are installed in a non-user serviceable enclosure, sealed with security screws. Fixed installation on towers is a typical use case. Access to equipment, system emplacement, and system operation is by trained personnel only. Customers will go through training prior use. All customers are required to sign an NDA [reference 20180301_Redacted_NDA.PDF]. Internal components are in non-user serviceable enclosure, sealed with security screws. No photos of internal components are released as all internal components are non-user serviceable items. Access to equipment, system emplacement, and system operation is by trained personnel only. All customers are required to sign an NDA [reference 20180301_Redacted_NDA.PDF]. User manual is part of the data restricted in the NDA. NDA states engaging with third parties requires written consent from SRC – Gryphon Sensors, and NDA will be required with third party prior to providing consent. A signed NDA is required prior to engaging customers on technical details of products. This NDA step for technical data exchange is required with customers, and as a result will take place prior to potential future sales. Will provide a sample NDA.

2. The RF Exposure (RFx) document submitted, "R1400 SAR", appears to assume a 4 W "peak amplifier power", however, the EUT's measured peak output power is reported as being 445 W. Please clarify how the MPE calculations based on a 4 W peak amplifier power are applicable to the EUT. {FYI – the term "SAR" is only defined for cases where the radiating structure is within 20cm of the human body; the report you submitted is actually an MPE report, which is defined for a minimum separation distance of 20cm or greater.}

R. Per customer: "We are interpreting this question as the "4W peak amplifier power" bullet on slide 11 in the file [18 SAR\R1400 SAR.pdf] as not being clear. For clarification, this is the peak amplifier power per element in the 256 element array. The RF safety calculations performed assumed nominal losses (ensuring we put forth a conservative safety result). Losses are higher in the system resulting in the reported output power. Also will upload R 1400MPE file to replace R 1400 SAR file. Same document, changed the file name to help with clarity.