

**REPLY TO ATCB COMMENTS:** Prepared by Dharmajit Solanki, RFI Engineer, UltraTech Labs Inc.  
November 15, 2004

FCC ID: AFJ278201

RE: Icom Incorporated

1.) Please review the Tx conducted and Tx radiated spurious data shown in your Test Report. The Tx radiated spurious data appears to show only data from the third harmonic or above. However, the Tx conducted spurious data appears to show the highest emissions occurred at approximately the second harmonic. Was Tx radiated spurious emissions measurements using the substitution method performed at the second harmonic? If so, kindly present this additional data.

Tx radiated spurious emissions measurements were performed up to 10<sup>th</sup> harmonics and emissions within 20 dB limits were tabulated. The modified test report is uploaded to ATCB with all emissions test results.

2.) Please review the External Photograph which contains the RF Exposure warning statement (page 5 of 7 of your Exhibit). The language for this label is not readable. Kindly provide a clearer label or line drawing.

Pl refer to modified file with External Picture no A2-6 uploaded today.

3.) The RF Exposure exhibit correctly identifies 38cm as the minimum appropriate distance to maintain RF Exposure compliance. However, the Manual proposes a separation distance of 79cm. What is the rationale for using 79cm?

Icom recommends minimum separation distance of 79 cm without accounting for Duty cycle factor(50%) as worst case.

4.) Are any views missing from the Internal Photographs? With 45 watts of RF power I assumed that large heat-sinked component should be easily visible, but I cannot identify such from the photographs. Kindly help me identify the RF power amplifier for this product. An overall photograph of the assembled inside view of this product would also be helpful.

Pl refer to modified file with Internal Picture no A3-8 uploaded today. You can see the RF power amplifier and heat-sink component.

5.) FYI: Our information from FCC indicates that RF Exposure warning statements should be visible to the operator once installed. I am not certain if your top mounted label near the rear of the chassis will meet FCC's current thinking. We are currently checking with the Commission.

Let us know FCC comments. We have approved products with similar label location from ATCB very recently.