



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

February 21, 2007

RE: FCC ID: AFJ298001_ATCB004563
Attention: Tri Luu

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that the report states that the 2005 version of 47CFR Part 90 was used. Please note that part 90 has changed in many aspects since 2005. Please use the latest and most current version of the CFRs when testing to Part 90. Please confirm that all testing results are compliant to the latest FCC rules. The latest FCC rules may be found at <http://ecfr.gpoaccess.gov/cgi/t/text/text-idx?c=ecfr&sid=d119a323af32d14f104e90e1030a5c8e&rgn=div5&view=text&node=47:5.0.1.1.3&idno=47>.
2. FYI – Please note that 406.1- 416MHz under part 90 is an operational fixed category. This device appears to be a mobile only type device. It is not clear from the new FCC interpretations if the 406.1MHz test frequency is suitable for this device. Please be aware of this possible difficulty.
3. Please note that the frequency band between 406- 406.1 is emergency position indicator radio beacon frequencies. Please note that a part 90 device may not transmit any portion of its signal may be in that band. Please note that your test data taken at a center frequency of 406.1 shows the lower sideband as non compliant as it operates in the forbidden 406-406.1MHz band. Please retest this lower frequency so that no part of the transmitted signal higher than the 99% bandwidth falls within the forbidden band.
4. Please note that as this application includes extended frequencies for Part 90 testing must still be only on part 90 frequencies. Please note that 435.05 MHz does not appear to be a part 90 frequency and thus should not have been tested. Please either remove the data for this frequency or please test on another frequency that is part 90 (i.e perhaps 453.0125MHz).
5. Please provide an MPE report supporting the 48cm separation requirement in the manual.
6. Please provide a letter justifying why the frequency range listed on the grant should include non part 90 extended frequencies. Such justification may be military use or exportation etc. This is a requirement of the latest FCC interpretations dealing with listing extended frequencies.
7. Please note that additional comments may results depending on the resolution of the above items.

Dennis Ward
<mailto:dward@AmericanTCB.com>

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.