



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

June 9, 2003

RE: FCC ID: AK8PCGABA1

Attention: Toyokazu Imamura / Kanako Sanda

I have a few comments on this Application.

1. Please note that this is NOT A MODULE (i.e. not used inside a Host device). This is a stand alone Bluetooth USB Adapter/peripheral. Consequently, it cannot be granted as a module – and must be granted as a stand alone transmitter. The module request letter will be deleted from the application.
2. FYI – Please note that conducted emissions has two limits – QP and Average. You must show compliance to both. While a peak or QP measurement may be used to show compliance to the average limits, the margin to the average limits must still be shown. Consequently, when you only provide peak or QP readings, your reports are inaccurate and incomplete in that they do not show compliance to the average limits (which are 10dB lower than the QP). This means the actual margin of your device when only a peak or QP reading is recorded, is a full 10 dB lower than you report. Here is a general guideline: A peak reading, if under the QP and Average Limits, can be used to show compliance to both the QP and Average limits. IF the peak is over the QP and the QP reading is under both the QP and average limits, then the QP reading can be used to show compliance to both the QP and Average limits. If the QP is under the QP limit but over the Average limits, then both the QP and Average measurements must be taken and compared to the proper limits. In any case BOTH QP AND AVERAGE LIMITS MUST BE COMPARED to derive a proper margin for the device.
3. Your theory of operation states that the antenna is explained in the “Declaration concerning Antenna Specification”. Please provide this document.

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.