



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

September 18, 2008

RE: FCC ID: ALH413500_ATCB006776

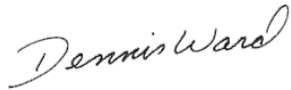
Attention:

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 operational description states the operating frequency range for this device is 136MHz to 174MHz, the 731 and extended frequency band justification states the operating frequency range is from 150MHz to 174MHz. Please be consistent in describing the limitations and operating parameters of this device. Please review ALL documentation and correct as necessary.
2. Please note that the manual states that rf exposure is for Occupational Use Only. Please note that the device is also stated to be for both parts 22 and 74. Please explain how occupational use apply to parts 22 and 74. Please show evidence that occupational use apply to part 22 and 74.
3. Please specify to what sections of parts 22 and 74 this device is being certified. For example, 150-152MHz and 157-169MHz might be part 22.561; or you may even be applying 22.725 in the 157MHz range, but what part 22 section are you applying 159-162MHz? Please provide this information in the report or separate exhibit so test results can be verified appropriate. Please provide this for both Part 22 and 74.
4. Please note that neither FCC nor IC contains a request for any frequency below 150MHz. Please explain why you tested radiated spurious emissions at 141MHz. If this is a frequency used in the device please correct ALL documentation to account for this. Please be consistent in the application and please test appropriate FCC rule part and RSS frequencies.
5. Please note that in accordance with the FCC band listing policy, when testing to a channelized rule part you must use actual frequencies. Please use actual channel frequencies for your data and please follow the testing requirements of the band listing policy KDB634817par g.
6. Please note that recently the FCC issues a notice that the final full manual must be provided before the equipment is marketed. Please note that the documentation under the heading of manual provided does not appear to be a full manual. Please explain and please provide a full manual before the device is marketed. If this is a full final manual, please verify.

IC

7. Please note that your report only shows one frequency tested to IC standards. Please note that unlike FCC Industry Canada requires multiple frequencies to be tested in each band being certified. Please see RSSGEN section 4.3(f).
8. Also, there are three distinct bands in the 138-174MHz band in Canada – these are: 138-144MHz, 148-149.9MHz and 150.05 to 174MHz. You have provided data for only one frequency in one band that being the 138-144MHz band. However, the IC application is for the 150.05 to 174MHz band. Again, please be consistent with documentation. Please retest IC for actual frequencies in the band for which certification is being requested. Please follow RSSGEN 4.3 for the number of required frequencies to be tested.
9. Please note that your radiated spurious emissions test data appears to be taken at 150MHz. Please note that the frequencies between 150-150.05MHz is not allowed under RSS119. Please test IC in accordance with the requirements of RSS119.
10. Please note that the IC app states the frequency range is 150 – 174MHz. Please note that the range between 150 to 150.05 is not allowed under RSS119. Please correct the IC application to reflect actual allowed frequencies.
11. Please also note that as 150MHz to 150.05MHz is not allowed under RSS119 you cannot use 150MHz as a test frequency. Please correct your IC data to show testing on an appropriate frequency.
12. Please note that subsequent comments may result depending on the answers to the above comments.



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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. Except as described in §0.459, correspondence and responses 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.