



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

March 6, 2009

RE: FCC ID: ALH423500_ATCB007353
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 I have a question to the FCC on SAR for this device. KDB447498 section 5b states that push to talk radios below 500MHz must perform SAR measurements if the power is more than 5 times the listed power in the table or 1.25W. This means that SAR would most likely be required on this device for FCC as the power is 5W. KDB628591 section 2b better known as the exclusions list states that if SAR is required on Push to Talk below 300MHz the application must go directly to the FCC. If the FCC responds that SAR is required for this product, then you must submit the FCC portion directly to the FCC. I will not review the FCC data until I receive a response from the FCC on SAR or not.
2. Please note that the IC application form is not properly completed. As this is uploaded to the IC at the time of granting the document must be accurate. Please complete the following sections of the form: 99% bandwidth, do not list field strength when power is listed,
3. Please provide an adequate IC cross reference for the necessary testing for this device. Please include the reference and applicability of each test to the RSS used.
4. Please note that the operational description says the device operates between 136 to 174MHz, but the IC app says 138 to 174MHz. Please explain and resolve the frequency listings.
5. Please explain the Modulation limiting plots; they do not look right.
6. Once I receive a response from the FCC I can better evaluate both IC and FCC.

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. 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.