



American Telecommunications Certification
Body Inc.

6731 Whittier Ave, McLean, VA 22101

March 6, 2009

RE: FCC ID: ALH423500; ATCB007353

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.

Information regarding FCC requirements and how they are met was uploaded to this application earlier today.

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.

Not required because RSS Gen says if you have a defined bandwidth, you don't have to measure 99% bandwidth.

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.

Cross-reference is being remitted with this RT response.

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.

The circuit description has been modified to correct the typo and now reflects 138-174 MHz.

5. Please explain the Modulation limiting plots; they do not look right.

We had problems with our audio analyzer and did not realize it when the plots were taken. New plots have been taken and a revised test report with the new plots is being remitted.

6. Once I receive a response from the FCC I can better evaluate both IC and FCC.

Information for the FCC PBA has been remitted.