



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

May 24, 2004

RE: VeriFone Systems Pte. Ltd. Taiwan Branch

FCC ID: B32OMNI3750G

After a review of the submitted information, I have a few comments on the above referenced Application.

**Administrative Issues:**

- 1) Please provide a block diagram of the RF board. As an alternative, you may add information to the parts list that lists that shows that this part is provided by another manufacturer other than the applicant.
- 2) The block diagram appears to show both a CDMA and GPRS boards. Please confirm this application is only for the GPRS US version, and not CDMA version.
- 3) The operational description mentions an additional 802.11 card that may be added. Note that this approval will only be for the Part 22/24 operation and does not cover the co-location with the 802.11. This will have to be added via a permissive change at a later date if desired.
- 4) The TX appears to be a plug in module, yet FCC labeling appears to be on the host. Please explain if the host (when labeled with information contained in this exhibit) will always be sold with the TX installed. If the RF board is expected to be able to be removed/replaced with different options by the user, then maybe a modular approval may be better. However this application does not currently support a modular approval. Please explain.
- 5) The labeling exhibit does contain language regarding a modular approval. However this application does not appear to be for a modular approval. However, this may be desirable given the information above if sold as an upgrade, etc for the host equipment. Otherwise it is expected to only be sold installed with the host unit. Please confirm and provide further information regarding this. Call to discuss if necessary.
- 6) The sample labeling appears to be missing the required Part 15 2 part statement. Please explain/correct as necessary.
- 7) The parts list appears to mention 2 models (MC55 & MC56) that may contain GPRS capability. Please explain the difference between these 2 models. How do these differences affect the approval?
- 8) Is the schematic of the GPRS RF board available? If not, as an alternative, you may add information to the parts list that lists that shows that this part is provided by another manufacturer other than the applicant.
- 9) The parts list appears to show the modem has bands of operation outside the US. Please confirm which bands it contains, and whether they are intended for U.S. or not for each band.
- 10) Users manual appears to be missing RF exposure statements and non-colocation warning statements. Please adjust.
- 11) FYI...Note that this device appears to contain a Telco interface, which is subject to Part 68/ACTA requirements. This application will only cover the Part 15 requirements of this device.

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**Technical Issues:**

- 12) Maximum EIRP data appears to be 1.050 Watts, while in the report, 731, etc. all state 1.104 Watts. It appears the 1.104 may be a typo. Please explain.
- 13) Transmitter conducted measurements should be provided for up through the 10<sup>th</sup> harmonic and comparing to the -13 dBm limit as well. Please provide.
- 14) Page 10 of 58 mentions 200 kHz bandwidth. This appears incorrect given the measured value, and theoretical value.



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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. 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.