

August 23, 2004

RE: Fujitsu Ten Limited

FCC ID: BAB271000-322

The following is in response to comments on the above referenced Application.

1) Is a photograph of the PCB layout Photo-2 (RF-unit solder-side) available without the metal "bar" across the board?

A photograph has been requested, and if available that photo will be provided. However, please note that this particular metal assembly is the mounting structure / heatsink of the MMIC, and separation of the ground metal from the device will likely destroy the MMIC. (This may be linked to removing the packaging from an IC.) No recognizable components will lie between the metal structure and the MMIC wafer, as this structure simply acts as a heatsink for the components within the MMIC structure.

2) It appears that only part of the RF schematics may have been provided. Please explain and/or provide as necessary.

A request has been made with the manufacturer for more complete schematics of the RF subsection, and if available they will be provided. However, much of the high frequency RF subsystem is enclosed in the MMIC device; custom manufactured for this application and pre-packaged as the PCB RF UNIT. Since, in general, RF schematics of RFIC's are not required during certification (only block diagram information), it may be expected that the schematics for a similar MMIC structure (which may be the property of a third party vendor) also would not be required. Please comment on the requirement for RF schematics of RFIC's and MMIC's during the certification process so that we may proceed in acquiring the schematics requested.

3) Please explain the difference between the 221.7 MHz bandwidth measured and the CW bandwidth shown in the report. It appears that the emissions were not adjusted by 10 log (EWB/RBW). Please correct or explain why this was not necessary.

221.7 MHz is the max-held measurement of total chirp/CW bandwidth while in the standard FM(chirp)/CW modulation mode. It does not represent the instantaneous bandwidth (EBW) of the chirp/CW radar. The test report lists the instantaneous EBW, which is demonstrated to be less than the input bandwidth of the Spectrum Analyzer.

4) Figure 5.3 appears to be measuring between the incorrect points.

Yes, the markers in the plot are not on the appropriate signals. However, the correct period of 200 ms was measured during testing and is the value reported in the report.

5) Please add labels to Plots 5.5 similar to last report.

The label has been modified.

6) For 9.654 GHz, 18-26 GHz, and 40-76 GHz measurements show in Table 5.1 & 5.2, please explain compliance to 15.35 for limiting peak emissions.

For all bands listed, peak measurements were first made. When no emissions were observed, the spectrum analyzer was setup for average measurement in order to demonstrate compliance with the average limits. Please note that no emissions greater than the system noise floor were observed in these bands.

7) Test equipment does not appear to show any measurement antennas for 60 – 75 GHz.

The test report has been corrected to list the appropriate equipment. Our apologies for the clerical error.

8) Please correct the IC form from radar device to FDS device.

The IC Form has been corrected.