

August 31, 2009

RE: FCC ID: BRWDAMTX11

Attention:

Please find our responses to your comments on this application below:

1. Operational description: There are two U2s in the operational description. This may be Typo second should U4. U2 is correctly identified on schematic. Write up about M2 and M3 is mixed up. U5 was not mentioned, its function should be described.

Response: See revised operating description.

2. The statements regarding RF Exposure and separation from the user in end product are not qualified. To wave SAR evaluation requirement would like to see an exhibit showing how the distances are maintained in the end use product that they are claiming maintains the separations described. If this module were sold to OEMs for integration into other devices, how would you know that the 5cm distances are maintained in those products? You have to limit the use to specific host devices that you evaluated.

Response: See uploaded RF Exposure exhibit detailing separations distances in the handheld controllers.

3. In the test report, it states that the device was continuously transmitting during testing. Was this continuous transmission at the duty cycle described in the operational description? If so, how were the PSD and average FS measurements performed to assure that they were taken only when the transmitter was at full power?

Response: The product was placed into a continuous wave transmission mode for testing purposes. This superseded the typical non-continuous normal operation transmission pattern.

4. In the test report on page 9 of 13 of T74282 (PDF page 27 of 39), I'm confused by the superscripts for notes 2 and 3 and by the - in the rate column for output power. Note 2 is for both rate and EIRP and there is no note 3 for output power that I can find. What rate was used for output power and what is this second column for output power supposed to be since there are no values.

Response: See revised test report.

5. The application form Mode of Operation and Type of modulation should be changed to DTS.

Response: See revised application form.

Regards,



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Updated Exhibits:
Test Report
Application form
Operational Description
RF Exposure separation distance document