



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

August 31, 2004

RE: DBTEL Incorporated

FCC ID: BW3DB-2068

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) The Confidentiality letter calls for Block Diagram, Schematics and Parts List to be held Confidential. There is no mention of Tune-Up Procedure. Please confirm that Tune-Up should not be held Confidential.
- 2.) The Tune Up exhibit contains inside the Block Diagram that was requested be held Confidential. This discrepancy must be resolved before a Grant can be issued.
- 3.) This product is multiband and contains both DCS/GSM functions that are not applicable in USA. Please provide a letter from DBTEL that attests that non-USA bands [list the frequency bands and system] will not be available in US.
- 4.) The Tune-Up procedure does not contain any target values for RF power. Please revise.
- 5.) The Internal Photographs appear incomplete. Please remember that all RF shields must be removed, and both sides of any printed wiring board should be photographed.
- 6.) The label is of incorrect format. The FCC logo should be removed and simply the identifier in the format "FCC ID: XXXxxxx" should be presented.
- 7.) In addition, the label should contain the language found in 47CFR 15.19(a)(1). This language is commonly referred to as the "one-part statement" and applies to all Licensed radio transmitters that contain a receiver. It is a stronger that the "two-part statement" of 15.19(a)(2) [common to all Part 15 computers and low power transmitters] and allows for stronger legal rights to the consumer against received interference.
- 8.) Test Report: I am concerned about the Tx Spurious Emissions test. The signal presented is a repeating 1ms pulsed transmission viewed on a plot, multiple GHz in span, with a relatively short sweep time. Kindly explain how the laboratory was assured that the maximum spurious emissions are shown.
- 9.) Test Report: Section 4.7.3 gives a description of the substitution method for finding spurious emissions, but the data tables of 4.7.5 appear to show only the standard radiated field strength methodology. Please review and correct.
- 10.) Test Report. 47CFR Part 2.1057 requires that measurements be made to the 10th harmonic. The test results provided in Section 4.8.7 does not seem to comply with this rule. Please review.
- 11.) Please provide voltage and current through the final amplifier as required by the Rules in 47CFR 2.1041(c)(8).
- 12.) Please provide measurements justifying the requested emission designator of 300KGXW.

William H. Graff
President and Director of Engineering

[mailto: whgraff@AmericanTCB.com](mailto:whgraff@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. 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.