



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

February 15, 2005

RE: DBTel, Inc.

FCC ID: BW3DB-2901

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

- 1.) The identical document is uploaded as both Operational Description and Tune-Up Procedure. This is not permitted. Kindly segregate the Operational Description from the Tune-Up Procedure. In addition, this document incorrectly identifies this as an instruction set for a user to "tune-up" the 2910 phone. Please correct.
- 2.) The supplied Tune-Up procedure does not identify target power values and their tolerances in either dBm or in watts. Tune-Up values are supplied in some sort of "magic number", but without any associated units I cannot properly evaluate this document.
- 3.) The Block Diagram appears to indicate this device can operate as CDMA 1900, 1800, 800, 450 MHz, AMPS 800MHz, or GPRS. Is this true?
- 4.) Two similar manuals were supplied: one is identified as (F12C)UserMan and the other as (J9)UserManualnew. Which one should be evaluated?
- 5.) Regardless of your response to item #4, neither manual correctly identifies the SAR values shown in the SAR report. These values must be consistent and match throughout the entire filing. Please correct.
- 6.) The Form 731 does not correctly identify the RF power. Kindly recall that RF power for all Cellphones under Part 22 devices must report their power in units relative to a dipole (dBd). Kindly revise form 731. In addition, please confirm the frequency tolerance as .042 and identify the units as either ppm, Hz, %, etc. Please confirm that all units manufactured will adhere to your Applicant's tolerance as specified on the Grant.
- 7.) Please also note that if any additional emission signatures are operable in USA (see item #3) then they also must be listed on Form 731.
- 8.) Please identify the type and gain (measured or theoretical) of the antenna.
- 9.) Was EUT tuned up to it's maximum power target value at the beginning of testing?
- 10.) Kindly review the body-worn setup photograph on pp.79 of the SAR report. Is the device plugged into the bottom of the EUT the headphones or the charger?
- 11.) Please review the validation plots on pp.26/27 of the SAR report. I expect to see a more symmetrical distribution of SAR values centered directly upon the axis of the dipole. This makes me question if the mechanical scanning function may be set to too high a speed. Please review and comment.
- 12.) The FCC logo actually only applies when this device is attached to a computer and the phone acts as a computer peripheral. In addition, the one-part statement of 15.19(a)(1) should ideally appear on the label:
 - a. *"This device complies with part 15 of the FCC Rules. Operation is subject to the condition that this device does not cause harmful interference."*

A handwritten signature in black ink, appearing to read 'William H. Graff', written in a cursive style.

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.