



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

February 22, 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 "new" Form 731 still does not identify the RF power correctly. In fact, this form looks exactly like the "old" form with exactly the same information. Is there some mistake? RF power is identified as "0.135W (GSM)". This is not correct for a Part 22 CDMA phone. Correct units for any 800MHz Part 22 phone with a permanent antenna are ERP (not GSM). Kindly review your document and resubmit. I recognize that the Test Report finds a measured radiated power of .135W ERP, but the filing seems to confuse itself over whether it is a CDMA or GSM report. Kindly read the complete filing one last time and remove any discrepancies.
- 2.) Documents uploaded to the ATCB server on Feb 21 and identified as "T301M Tune Up Procedure" and "T302C Tune Up Procedure" do not appear to be written for this product. Target value tables are given for GSM800, DCS1800, and PCS1900; but nothing provided seems relevant to a 800MHz CDMA product. Please review. Your response to question #2 of my earlier RT for 02/15/2005 that target values "Not ready yet." is insufficient. This document is needed for final review.
- 3.) FYI: The use of the "FCC Logo" on the label is not correct. The FCC logo only applies to computing equipment that has gone through testing and the Declaration of Conformity procedure by an accredited lab (see Parts 2 and 15 of the Rules). It only applies to basic EMI regulations. The use in the Manual seems to indicate DoFC compliance with SAR regulations. To be perfectly legal the use of "FCC Logo" on a cellphone would only make sense if the phone by design was intended for attachment as a "computer peripheral". Please advise your client to remove the FCC logo from future label printings unless phone is designed for attachment to a computer as a peripheral.
- 4.) FYI: The correct equipment code for all single-band 800MHz Part 22 phones is TNE. Use of PCE is for dual-band Part 22/24 phones, and single band 1900MHz Part 24 products only. I will make this correction myself.

William H. Graff
President and Director of Engineering

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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.