

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

October 21, 2005

RE: FCC ID: C9SDTA01TP400GS ATCB002872

Attention: Naoki Sakamoto / Hisayuki Kioka

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

- 1. Please note that the 731 and other documentation indicate that this is a WLAN only application. However, the test report contains BT FHSS test data. Please provide a test report that is representative of this application. If there is a BT in the device please correct all documentation to clearly identify this configuration.
- Please note that the 731 states that the power of the device is 50mW. However, the test report shows that the power is 18.49dBm (70mW). Please make all documentation consistent and representative of the device being certified.
- 3. Please note that the EMC and SAR report appear to be identical with the C9SDTA01TP400GSB_ATCB002871 application. Please note that test reports should reflect only the item being certified and should not be ambiguous. As one model contains a BT transmitter and one does not, the affects of SAR may be different between the models. Please justify the comment on page 4 of the SAR report about the selection of models used in the test. (i.e. what steps were taken to ensure that the BT did or did not affect the SAR of the model in question).
- 4. Please note that as testing for body worn configuration was done without accessories, the manual needs to address the fact that SAR is only applicable for body worn accessories that do not contain metal. It is also generally accepted that the highest level SAR measured is place in the manual. Please note that as the device was tested in touch position, the separation distance does not need to be in the manual. Please correct the manual to address body worn accessories that do not contain metal and please include the highest Body SAR value in the manual. Please review the recommended wording for body worn accessories in OET65c and IEEE1528 and apply accordingly.

5.

Dennis Ward

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Dennis Ward

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.