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

June 10, 2003

RE: Sam Ash Music Corporation

FCC ID: CCRHT5

I have a few comments on the above referenced Application.

1) The FCC Label shows "FCC ID CCRHT5". Note that the colon is missing after the words FCC ID. Please correct to "FCC ID: CCRHT5".
2) The operational description provided does not appear to include information on this device. Please correct.
3) The test report and 731 form state the device operates from 174 - 216 MHz which is given in Part 74 for low power stations. However the users manual states 174.6-213.2 (front) and 173.80 - 213.20 (back) which falls outside this band. Note that 74.861 states that low power auxiliary transmitters not required to operate on specific carrier frequencies shall operate sufficiently within the authorized frequency band edges to insure the emission bandwidth falls entirely within the authorized band.. Please correct any incorrect exhibits and provide the actual list of transmitting frequencies to show compliance with this section.
4) The emission designator given in the manual (80KF3E) does not match the 731 from and test report (130KF3E). Additionally the users manual mentions a peak deviation of 15 kHz, compared with 50 kHz given in the report. Please explain and correct the affected exhibits.
5) The users manual mentions Part 74 and Part 90, while this application appears to only be for Part 74. Please explain.
6) The users manual states the device is capable of 20 mW (+13 dBm), but only -21.28 dBm was measured using the substitution method. This is a large unexpected difference of 41.28 dB. Please explain. Additionally, please note that the technical requirements of 74.861 mention measuring at the output terminals so a direct connection method is the preferred method for this section of the rules if it can be performed. Note that the grant will list the direct connection results if these can be provided, otherwise the ERP power will have to be used.
7) Note that the European version only operates at 2 mW, which is 10 dB lower than the U.S. version. If the device provided in this application was not properly operating at full output power expected of 20 mW, then retesting of spurious emissions will be required also due to the increase of output power.
8) Page 22 of the test report states testing was performed to 1 GHz, while the other tables state 2 GHz. Please explain.
9) The test report should reference the most recent published version of Part 2/15/74, for example October 2002. Additionally, Part 15 Subpart H given on page 4 & 32 of the test report is not valid. Please correct.
10) Please provide:
    a) DC voltages & /currents applied into the several elements of the final radio frequency amplifying device for normal operation over the power range
    b) Tune up procedure over power range
    c) Description of all circuitry and devices provided for determining and stabilizing frequency, for suppression of spurious radiation, for limiting modulation, and for limiting power.

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11) Please provide information regarding the conversion factor for substitution methods as you have in past reports.
12) The test report includes data for the receiver portion of the device. Note that a separate application must submitted for certification of the RX, or alternatively a DoC performed by an appropriately accredited test facility. The RX information will be ignored within this application, however please comment on what compliance route is being used for the RX (separate certification or DoC).

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Examining Engineer

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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.