



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

November 1, 2006

RE: FCC ID: CWTWDU632_ATCB004198
Attention: Yoshiko Mizuta

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. FYI – please note that the limit in 15.209 for 125kHz at 300 meters is 19.2dBuV/m. Extrapolating this to the 3 meters used in the report gives an average limit of 99.2dBuV/m and a peak limit of 119.2dBuV/m. Your report states a peak limit of 125.3dBuV/m at 3 meters. Please explain your calculations at deriving this limit. Please note that this does not affect the pass/fail of the device but is a note to inform you that the correct limits must be used and justified.
2. Please note that while you indicate a loop antenna in the calibration table, the fundamental emissions and spurious emissions below 30 MHz has no indication that testing was in fact performed using a loop antenna. Further evidence on page 8 section 5.4 indicates that a loop may not have been used. Please clarify the use of the loop antenna below 30MHz and/or retest frequencies below 30MHz using the required loop antenna.
3. Please explain the term “learning mode” in the manual.
4. Please provide evidence as to how maximized emissions occurred at the highest data rate and configuration.

Dennis Ward
<mailto:dward@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.