



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

July 7, 2003

RE: FCC ID: DD4P7TB_ATCB000564

Attention: Mark Mastroianni / Edgar C. Reihl,

I have a few comments on this Application.

1. Report section 2.1 (Summary of Test Results) states on page 4 of the report, "that the device was done in accordance with the Filing and Measurement Guidelines for Frequency Hopping Spread Spectrum Systems DA 00-705 and Appendix A "BLUETOOTH APPROVALS." Please note that this is a not a bluetooth device. This is a Part 74 device. Also, please note that test methods for licensed parts are to be done to EIA/TIA 603. Please correct the report to reflect the proper testing and test methods. xx
2. FYI – please note that the power listed in the limit table on page 9 of the report is listed as "Radiated". Please note that the limit IAW 74.861(e)(1)(ii) is at the input of the antenna (i.e. conducted power). xx
3. Please provide information on the modulation used for the OBW plots. What was the input modulating frequency, etc. xx
4. Please note that all devices other than Part 15 and 18 require radiated field strength measurements in accordance with 2.1053. Please note that this is an antenna substitution measurement, not a part 15 field strength type measurement. Your explanation of radiated emissions provided on page 6 of the report is inadequate and incorrect. Please provide the proper antenna substitution data for radiated emissions of a part 74 device. xx
5. Please note that because of the apparent incorrect reference to the type of device (i.e. Bluetooth and not a part 74 device - see item 1) and because of the apparent incorrect use of ANSI C63.4 as a radiated emissions measurement method (see page 6 of the report), it is not clear if any of the testing was performed correctly. Please provide a brief description of the test methods used for the conducted antenna terminal measurements, the Occupied Bandwidth measurements and antenna substitution radiated spurious emissions measurements. Please also note that licensed devices must meet 47CFR part 2 as well as the specifics of the individual part under which a device is being certified (i.e. Part 74 for this device). Please make sure that all parts (2.1046, 2.1047, 2.1049, 2.1051, 2.1053, 2.1055 and 2.1057) and any particular variation associated with Part 74 are properly addressed in the report. Also, please use the FCC accepted test methodology for licensed devices (i.e. TIA 603 as appropriate). xx
6. FYI – no action needed. Please note that the parts list is not classified as confidential. This exhibit will be listed on the FCC website and available for view to the public. If confidentiality is desired for the parts list, please include this on the request for confidentiality.

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.