



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

January 18, 2006

RE: FCC ID: E52B5J0452_ATCB003107
Attention: Naoki Sakamoto / Kanako Sanda

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 transmitters that are only boards are not certified under 47CFR unless they are modular approvals. The device must contain its own shielding. The request letter clearly states that the device does not have shielding and therefore it does not meet the requirements for a modular approval. Please note that the reason a module must have its own shielding is because it is not possible to say how the emissions characteristics of the device will respond in a host housing. In order to be a limited modular approval you must test and show compliance of the device in at least one type host device. Without testing in this manner this device is not certifiable in the condition shown in the external photos.
2. Please note that a device approved under the modular approval process must have onboard voltage regulation and cannot get its voltage regulation from sources off the module. The reason for this is that as a modular approval it is not possible to know what host the device will or will not be placed into. Please note that as this device does not have its own voltage regulation it cannot be approved under the modular approval process but must be approved inside a host as an LMA. Please provide test data showing compliance of this device as a MNA and not a modular device.
3. Please explain item 3 in the modular request letter. Does the device have onboard data buffering (i.e. does the Processing Unit R5F21162SP shown in the schematics contain data buffering capabilities) or is the buffering done off module? If the data buffering is not done on the module then it cannot be granted as a module but must go through an LMA process whereby it is testing in a host.
4. In regards to items 1, 2 and 3 above, this also then means that, because it does not meet the requirements for modular approval, the FCC ID label will be on the host and not on the board of the transmitter. IF the FCC ID is desired to be on the board and the board is desired to be a modular approval please provide a device that has its own shielding. Alternately, please provide a sample label showing where the label will be placed on the host.

Dennis Ward
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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.