



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

July 29, 2005

RE: FCC ID: E5MDS-2710AC_ATCB002634
Attention: Juan Martinez

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 your cover letter states that this is to add part 80 "Public Mobile Service". Please note that Part 80 is not the Public Mobile Service but is the Maritime Service rule section.
2. Please note that operation under part 80.207(d) in the 216 to 220MHz range is limited to F1B, F2B, F2C and F3C emissions designators. Please note that the only other emissions classes allowed in this range are for radiotelephony using G3D, G3E, INMARSAT, and radiodetermination using A1D, A2D, F1D, F2D, G1D and G2D. Please note that F1D and F2D are only allowed in this range for radiodetermination transmitters. Please also note that F3D is not an allowed emissions designator for part 80 transmitters in this range. Please also note that footnote 20 (other type digital emissions) only applies to the 156 to 162MHz range for radiotelegraphy. The 731 form shows that this particular device has emissions designators of 11K0F3D, 9K13F2D, 9K13F1D, 16K8F2D, 16K8F1D. Also, this transmitter is stated to be a data modem and does not appear to be a radiodetermination device. Please explain how a data modem such as this device meets the Part 80 requirements. Please point to the specific section under the Part 80 rules that would allow this type device in the Maritime Service.

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.