



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

October 20, 2006

RE: FCC ID: F8I-DSC0802P\_ATCB004156  
Attention: Joel T Schneider / Jolene Murphy

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 for purposes of the FCC this type device is not classified as equipment code AMP, but would be either TNB or PCB. Please correct the 731 form to show the proper equipment code. Please see the FCC guidance document for amplifiers, boosters and repeaters for clarification.
2. Please note that the brochure states the device "Supports 800 cellular, 800 SMR, 900 SMR, and 1900 PCS." Please note that the 731 only addresses PCS and Cell operation. Please provide appropriate test data for all appropriate rule parts. Alternately, please correct the documentation to show how this device is used with only PCS and Cell operation.
3. Please note that the brochure states the device is capable of "modulation standards; e.g., iDEN®, GSM, CDMA, W-CDMA, 1xEV-DO." Please provide test data showing inputs to the device for all modulation types used.
4. Please note that on pages 22, 23 and 24 of the part 1 test report most of the frequencies used for power measurements are at or on the band edge. Please note that this would make the device automatically non-compliant with the associated rule parts as band edge data would exceed the -13dBm requirement (i.e. the peak of the signal is the band edge thus not compliant to parts 22 or 24). Please test the device using the correct signals specific to the rule parts for which the device is being certified. Please explain how the device filters prevent non compliance at the band edges.
5. Please note that temperature and voltage stability data shown in part 1 test report (starting on page 25) are taken at frequencies on the band edges. Please note that automatically means the device is non compliant. Please provide frequency stability data where the device properly operates within the allowed band and not on the band edge.
6. Please provide Occupied Bandwidth data for all modulation types used in the device (i.e. the brochure states 1xEV-Do as well as WCDMA, yet neither appear to have been tested.)
7. Please note that band edge data fails parts 22 and 24. Please note that the limit at the band edges is -13dBm. Please also note that the fundamentals used to measure band edge compliance are also frequencies at the band edge. Thus all band edge data taken under this condition fail rule parts 22.917 and 24.238. Please retest using appropriate frequencies for the specific rule parts under consideration. Please explain how the device filters prevent non compliance at the band edges.
8. Please note that based on the responses to the above comments, a further complete review of documentation provided may be necessary.

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.