



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

March 26, 2007

RE: Pison Teklogix Inc.

FCC ID: GM375273RADA

After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) I have not received any technical information as you suggested we should have received from Siemens. Therefore we are missing information such as block diagram, schematics, operational description, parts list, tune up procedure, etc. Please provide.
- 2) FYI....The comment removed and is not relevant.
- 3) FYI....This comment removed and is not relevant.
- 4) Your response mentions that the this application is not to cover co-location with the WLAN device. Please note that sample labeling clearly shows identification of 3 modules together (i.e. BT + WLAN + GSM). Labeling must not reflect this if this application is not covering this configuration. Additionally test reports also show presence of a WLAN card. Note this assumes the device is co-located for RF exposure concerns. If it is not able to TX at the same time as the WLAN then for RF exposure it may not be co-location. However in this case detailed explanation of this and how compliance with 15.15 is assured must be provided. Please explain.
- 5) Note that users manual section 3.9 mentions simultaneous use of the WAN, WLAN and BT. This does not agree with previous response regarding WLAN.
- 6) Some internal photos appear to show the WLAN card present. If this application is not to cover this co-location configuration, internal photographs should be updated to show the host as properly configured.
- 7) Values of conducted power in the RX report do not agree with powers listed in GSM and SAR report. Please review.
- 8) There appears to be as many as 7 or more different style heads (laser scanners). How are these factored into both EMC and SAR testing? Note that for EMC this is a limited modular approval so emissions are measured based on the whole device despite the modular nature of the approval including ERP, EIRP and spurious emissions. Additionally, for SAR, the device must consider all electrical and metallic changes. Please review.
- 9) For IC requirements for the PCS band, bandedge plot settings should be taken using specified settings of VBW > RBW, 10 sweeps minimum, and Power average mode. It does not appear this was done.
- 10) The Manual in figures 6.1, 6.2, and 6.3 on pages 218 and 219 show the equipment suspended from a belt clip or belt loop (i.e. Accessories include carry strap, carry case, pistol grip, swivel belt loop, and soft shell holster). This is an unusual body-worn position, and you shall need to document and justify with photographic evidence the use of 1.5cm spacing or provide additional test data as necessary. Additionally, it appears some of these body worn accessories position the EUT in a different position than tested. The original philosophy for use of the 1.5cm air gap was an assumption that a belt clip would be able to hold the transmitter away from the body at a spacing not less than 1.5cm. The arrangement illustrated does not appear to be able to maintain this separation. It would be far better to perform SAR testing in a configuration where the fabric carrying case was positioned directly on the phantom for testing. Additionally, note that the users manual does not appear to address body worn distances. Note that tested spacing are only valid

- for body worn accessories that maintain that distance and do not contain any metal. Please review.
- 11) FYI....Regarding labeling of the host. The label for the host appears to be being placed under a battery. Please note the following which should be supported in the application:

Recent information released from the FCC is as follows:

As an option to placing the FCC label on the exterior of the device, the FCC label can be placed in a user accessible area if the following conditions are met.

- a) The device is handheld.
- b) The FCC identifier is visible at the time of purchase. Marketing the device without the battery installed when the label is in the battery compartment is acceptable. The FCC identifier on the box or additional documentation directing the user as to where to find the FCC label also satisfies this requirement.
- c) The user accessible area must not require any special tools for access and the FCC label must not be placed on a removable part.
- d) The FCC identifier, model no. or FCC logo must be on the label and must meet all general labeling requirements or policies that apply for Certification, Verification or DOC; e.g. for Certification, for handheld devices, the identifier must go on the label but the two part warning statement in Section 15.19(a)3 can go in the manual.



Timothy R. Johnson
Examining Engineer

[mailto: tjohnson@AmericanTCB.com](mailto:tjohnson@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.