American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

January 5, 2006

RE: FCC ID: GM39160RA2050 ATCB003072

Attention: Kathy Grzovic / Desmond Fraser

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 the 731 states 15.247 and 15.407, however, the only listed frequency range is 2412 to 2462 MHz. Please correct as necessary.

Response: Please see the revised 731 Form uploaded with this response.

2. Please note that as the power output listed for the 5.25 to 5.35 band exceeds that of the 5.15 to 5.25 band limit (i.e. power is 19.6 dBm at 5.26 GHz), the device must show band edge compliance at 5.25 GHz as well as 5.15 and 5.35 GHz. Please provide evidence that the device meets the band edge compliance at 5.25 GHz when using the higher power in the 5.25 to 5.35 GHz band. This would include compliance data for the turbo mode at 5290 MHz.

Response: Please see the revised report uploaded with this response.

3. Please note that as the power in the 5.25-5.35 GHz band exceeds the limit of the 5.15-5.25 GHz band the 731 must show two distinct bands in this range. It must clearly identify the 5.15-5.25 band and the 5.25 – 5.35 band along with the individual power levels. Please provide a 731 form the clearly identifies these bands.

Response: Please see the revised 731 uploaded with this response.

4. Please note that while it appears that the schematics for the WMIA-123ABG have been provided, it does not appears that the schematics for the WMIA-154G-V01 has been. Please explain and/or please provide the schematics for this device.

Response: Please see the revised schematic exhibit uploaded with this response.

5. Please note that the manual only indicates professional installation for external antennae. Please note that the attestation/request letter states that the units ARE ALWAYS professionally installed. As such, this would also include any device using indoor antennae. Please correct the manual to state professional installation is required for all configurations. Alternately, please provide evidence to show how all non-external antennae meet the requirements of part 15.203.

<u>Response</u>: In the manual the wording regarding external antenna for the 9160 refers to antenna that are external to the 9160 device. All antennae for the 9160 are external to the device.

In the 9150 (the predecessor to the 9160) there was an option for the factory to install an internal antenna but this option is not available for the 9160. To avoid confusion for customers, Psion has used the wording of External Antenna.

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6. Please provide the professional installation guide used by the installers which clearly shows how the installer is to set the band edge power levels to keep the device compliant using all antenna(s).

Response: Please see the installation guide uploaded with this response.

7. Please note that the manual (page 30) states "Psion Teklogix terminals do not support Atheros Turbo modes and to prevent unnecessary radio overhead the use of Turbo mode is not recommended." Please also note that testing appears to have been done for turbo mode. Please explain.

<u>Response</u>: Although Turbo mode is not officially supported and therefore not recommended, it can be used and was therefore tested.

8. Please note that it is not clear from the report if the power levels at the band edges were adjusted per the installation procedure in which specified power levels are given for each antenna type. Please confirm that radiated emissions data for each antenna type was performed at the power level specific in the document "2005076B Psion 9160-RA2050 FCC&IC Test Report APX H Power R0.00.pdf." If the power level was not adjusted to these power levels, please provide data for these levels to insure that compliance is met.

<u>Response</u>: The original APX H exhibit contained errors. Antennas of like type but lower gain were not tested, but they will only be used with the power setting used for the testing of the highest gain antenna of a given type. Please see the revised APX H Power exhibit upload with this response.

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.