

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

April 15, 2003

RE: FCC ID: GU69460IPLA3021

Attention: Kathy Grzovic / Desmond A. Fraser

I have a few comments on this Application.

1. Your conducted power level listed on page 3 of the report does not match other power values (i.e. SAR report and page 29 of the report). The stated value on that page is 0.0112 W or 11.2mW (10.5dBm), however, the SAR report and other places list the power as 112mW (20.5dBm). Please correct power levels to be consistent and to reflect the proper values measured.

Response: The typographical error in the conducted power level has been corrected. Please see the revised test report uploaded with this response.

2. Please note that ANSI C63.4 states, "All instruments that can have a significant effect on the accuracy or validity of measurements made as specified in this standard shall be calibrated in accordance with the manufacturers recommendations and the instrument requirements of ANSI C63.2-1996." Table 6.1 "RADIATED SPURIOUS EMISSIONS TEST EQUIPMENT" shows a number of pieces of equipment as verified. These equipment types "have a significant effect on the accuracy or validity of measurements." Please verify that only calibrated measurement equipment was used during final measurements. Please provide evidence of this fact. If calibrated equipment was not used as required by ANSI C63.4, please retest using calibrated equipment.

Response: Calibrated measurement equipment was used during final measurements. The calibration dates have been included in the revised test report uploaded with this response.

3. Please note that the notch filter listed on page 30 of the report may have significant effect on the restricted band frequencies just above and below the 2.4 GHz ISM band used. As such this equipment is subject to calibration. You have listed the test equipment as only being verified. Please provide calibration dates for this equipment. Alternately, please justify why the equipment has not been calibrated but only verified; and why the use of non-calibrated equipment should be allowed.

Response: The notch filter used was found to have no effect on emission levels, so it was not used in the data presented. As such, the notch filter was deleted from the equipment list table.

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4. The attestation letter stating the AC adapter used with the non-wireless printer will not be used with the wireless printer does not state that other AC adapters can or cannot be used. How does the manufacturer prevent the use of AC adapters in the wireless version of the printer? Are the batteries rechargeable? If so, do they have to be removed from the printer to be charged? If they can be charged in the unit, can the unit be operational (printing) in the charge mode? If the manufacturer does not prevent the use of AC adapters in this version, and if the use of such adapters can be used during normal printing operation of this device, please provide conducted emissions passing data for an AC adapter showing that this device is capable of compliance to conducted emissions limits. If an AC adapter is not provided, but an AC adapter can be used with the wireless version, please provide passing conducted data of an AC adapter for the wireless version. Alternately, please explain why conducted emissions is not required for this unit.

Response: Please see the revised manufacturer's attestation letter regarding the AC adapter, uploaded with this response.

With regard to the batteries:

Yes, the batteries are rechargeable. One charger can charge the battery when the battery is in the unit. When this internal charging mode is utilized, the printer automatically goes to sleep to prevent its use while charging; this includes turning off the wireless card. Otherwise the battery will not charge correctly. There is another charger option. With this second charger option, the battery must be removed from the printer in order to charge the battery. No conducted emissions data is required.

5. FYI – no action needed. Please note that a 22 GHz span is far too great to make reliable measurements accurately. When measuring antenna conducted spurs a significantly smaller span produces more reliable data.

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.