



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

February 16, 2006

RE: ACCO Brands

FCC ID: GV333350

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Please provide a Manual for this device.
- 2.) Please provide a Label for this device.
- 3.) Please provide Test Setup photos for this device.
- 4.) Based upon the recorded field strength limits, I suggest you reconsider certifying this under 15.247. May I suggest that it might be easier to obtain a Grant for this device using 15.249 or possibly 15.209? In either case, the RF Exposure exhibit is not necessary and no RF exposure statements are required for the Manual.
- 5.) Assuming you do insist upon Certification under 15.247, I do insist that a new Occupied Bandwidth plot be presented. The span of 50MHz is simply too wide. Kindly repeat this test using the spectrum analyzer parameters shown on page 27 of the Test Report. I have my doubts if this device can make the 500KHz minimum bandwidth required for digital transmission systems (DTS) in 15.247.
- 6.) If this device can be operated when attached to an iPod while uploading/downloading files to a computer, AC Conducted emissions would apply. Please review the operational characteristics of this device.
- 7.) The Band Edge plots shown on Pages 22 and 23 are of little value without both RBW and VBW settings. Please provide this information. Since this is a mid-band fixed-channel device, I will not require a smaller span presentation centered directly on both 2400 and 2483.5 MHz. However, I do insist upon both Peak and Average data being presented.
- 8.) Kindly alert the Applicant that this Certification will be for a single channel fixed frequency device. Additional channels cannot be added at a later date without producing a new FCC ID.

William H. Graff
President and Director of Engineering

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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.

Any questions about the content of this correspondence should be directed to the sender.