



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

July 5, 2006

RE: FCC ID: H9PRF1224\_ATCB003685  
Attention: Gregory M. Snyder / Brian J. Dettling

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 application indicates that this device is intended for use in "hand held computers". This indicates the use of this device in a host that may be worn on the Body, yet no SAR testing was done in any host. Please explain how this device is used in a hand held computer and how that hand held computer cannot be worn on the body thus not requiring SAR testing. If the device is to be used in a host that can be worn on the body, please identify these type devices and provide SAR data in each type hand held computer in which the device would be used.
2. Please note that the manual states that a 'stand alone' external antenna configuration exists where a 25cm separation distance must be maintained. The manual also states the device is compliant to SAR requirements (indicating portable use). Please correct the manual as needed and please be consistent on the rf exposure configurations associated with this device.
3. Please note that the manual states that firmware can be updated. Please also note that the manual states that correct frequency operation in the associated countries is controlled by firmware. Please confirm that a US user cannot download or update firmware in the US that will allow the device to operate on non-US frequencies.
4. Please note that the MPE report and EMC report indicates simultaneous transmission on all bands. However, it is not clear from the manual or operational description if simultaneous transmission on different frequency bands is possible in this device. Please confirm if simultaneous transmission is an appropriate mode for this device.
5. Is this a modular approval or a Limited Modular Approval? If so, please provide a letter stating how the device complies with the modular approval requirements of D001407.
6. Please note that while the reports state that ANSI C63.4 was used as the test method, spread spectrum devices under 15.247 and UNII devices under 15.407 do not use ANSI C63.4 except in setup configurations. This type device uses specific test procedures established by the FCC. Please confirm that the appropriate approved test method was used to test this device.
7. Please note that the MPE data in the EMC report (pages 28 through 30 and 56 through 58) are not correct. The separate MPE report however, does have the correct information. Please either correct the MPE pages 28 through 30 and 56 through 58 of the EMC report or please remove this incorrect section.
8. Please provide a pseudo-random hopping list of the 902-928 FHSS device.
9. Please note that the 802.11a data provide in report "RF1224 Test Report - 802.11a.pdf" is almost 2 years old and is for a different FCC ID number. The FCC has stated that while they will accept data up to a year old, they will not accept data more than one year old. Please provide test data that is within the allowable time limit and please provide the relevance of test data not specifically issued for this device.

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.