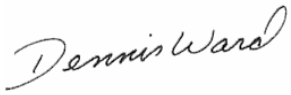
American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

April 27, 2005

RE: FCC ID: HDCTRC6320_ATCB002368
Attention: Gregory M. Snyder

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 page 6 of the manual states that "*The TRACER 6000 Series split systems ships with an integral low-gain antenna for some international applications.*" The device was tested with a model PL10F-23-N7A and a model SP2-5.8 parabolic dish antenna. However, gain in the documentation for the integral antenna does not match either of these two test antenna and the type antenna for the integral antenna is not mentioned. If all antennae are parabolic, then testing the highest gain antenna is sufficient. However, if the integral antenna mentioned in the manual is not of the type tested as listed, then data must be provided to allow this integral antenna as part of the filing. Please explain this antenna type and/or provide sufficient information and test data to allow its use.
2. FYI – Please note that the MPE calculations were done using 89.1mW. However, the acutual highest power measured was 95.5mW. The device MPE is still appropriate for the 4.6m separation listed, but the MPE report should provide correct data.
3. Please note that your AC line conducted emissions are not correct. Please note that while this device as a digital device may only be limited to Class A conducted emissions, as an intentional radiator under part 15.247 it is restricted to those limits of 15.207. Please note that while you state 15.207 in the report you do not compare the AC conducted emissions to the correct 15.207 limits but to an erroneous 15.107 limit for class A digital devices. Please remember that there are not two sets of limits for class A or B under 15.207; there is only one set of limits. This limit compares to the Class B limits under 15.107. Please also note that when compared to the proper limits, this device appears that it may be failing. Please use the correct limits and rule parts for intentional radiator conducted emissions. Please retest and show proper compliance to the QP and AV limits as defined in 15.207.



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.