



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

September 6, 2002

RE: Universal Scientific Industrial Co., Ltd.

FCC ID: IXMCF114100

After a review of the submitted information, I have a few comments on the above referenced Application.

These comments are all made upon the assumption that the EUT's full conducted output power is 21 mW and the antenna gain is 2.5 dBi.

- 1) The block diagram should show the frequency of all oscillators in the transmitter portion of the device (CFR 2.1033(a)(5)). Please provide a corrected copy.
- 2) CF cards must be treated similar to PCMCIA Cards unless specific configurations can be "locked in" (controlled use via specific hardware or software issues).
 - a) From the users manual, it appears that the only supported host configuration is Windows CE. Please explain if this is the only operating system to be supported.
 - b) Please explain how hardware and/or software will be used to prevent use in laptops or other devices.
 - c) If the devices intended use is for PDA's or hand held equipment only, please explain why the EMC report shows the device tested in laptop. Please describe how laptop data applies to hand held device, and/or re-test in hand held if appropriate.
 - d) The phrase "This device and its antenna must not be co-located or operating in conjunction with any other antenna or transmitter" must be added to the MPE statements in the users manual.

If the configuration can not adequately be "locked in", then the following will apply. Please note that in the past 2 weeks, the FCC has recently changed how to treat these types of devices for MPE/SAR related issues. 2.5 cm is no longer considered acceptable spacing for laptop configurations. The FCC has instructed us that we must consider that these device might be used in a touch position to the body. Assuming this device is for general purpose use please explain:

- a) The device should be classified for portable and/or mobile use.
 - b) State that the antenna may be closer than 20 cm.
 - c) Since the output power (either conducted or EIRP, Conducted = 21 mW, EIRP = 36.6) exceeds 24.6 mW (a number specified by the FCC), this device will require SAR testing. Please note that testing must be performed in a touch position to the SAR phantom. Alternatively, the power may be lowered such that the EIRP is less than 24.6 mW.
 - e) If SAR testing is performed, the Users Manual should contain information regarding the device and that it has met with SAR requirements. Additionally the current MPE statements would need to be modified.
- 3) FYI, one of the margins in Table 11 is lacking a negative sign.

- 4) If this device may be considered as a PC Peripheral, then a compliance information sheet should be included in the manual on the same page as the FCC statements (page 20 of 23 of the users manual). This information should contain the following information regarding DoC compliance:

COMPLIANCE INFORMATION (47CFR 2.1077)

If a product is tested and authorized under a Declaration of Conformity, a compliance information statement shall be supplied with the product at the time of marketing or importation, containing the following information:

- (1) Identification of the product, i.e. name and model number.
- (2) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.



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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.