



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

November 12, 2007

RE: FCC ID: JLFOMG2_ATCB005611
Attention: Hoosamuddin Bandukwala

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 block diagram is not in accordance with 2.1033 as it give no real information about the transmitter and only shows it as a single block. Please remember that since it is the transmitter that is really being certified, the block diagram needs to concentrate on that portion.
2. Please note the internal photo of the board is very blurry. Please provide clear internal photos.
3. Please note that 2.1033 states that an operational description is to provide "a brief description of the circuit functions of the device along with a statement describing how the device operates. This statement should contain a description of the ground system and antenna, if any, used with the device." The operational description provided is more like a users manual than an operational description of the circuitry in the device. Please provide an operational description in accordance with 2.1033 of the FCC rules.
4. Please note that the manual states that the line of sight transmit distance for this device is 1000 feet. This statement appear to indicate that the device field strength is intentionally designed to exceed the 94dBuV.m allowed by 15.249. Please explain and justify how a 15.249 device can effectively operate at a distance of 1000 feet.
5. FYI – No action needed – this is just a request of information for clarification. Please explain under what part 15 section the 'repeater' mentioned in the manual would be certified.
6. Please note that page 6 of 9 (pdf page 12) you state "The UUT was tested with the appropriate antenna..." You then show a diagram using a power meter, but give the results in dBuV/m. Please clearly show how the device was tested and what test method was used.
7. Please note that limits above 1GHz are based on average limits. Please also note that there is a 20dB above the average limit that must be met in peak detector mode. Please note that page 7 of 9 (pdf page 13) does not show if the readings are peak or average readings. Please clarify and please show that both the peak and average limits have been met.
8. Please note that the limit table on page 6 of 9 (pdf page 12) and the table of spurious emissions on page 7 of 9 (pdf page 13) shows a spurious emissions limit of 113.97wBuV/m. Please note that spurious emissions in not 500millivolt per meter but is 500Uv/m or 54dBuV/m average and 74dBuV/m peak. Please correct the report to compare the spurious emissions to the proper limit for spurious emissions.
9. Please note that in regards to the incorrect limits in item 6 it is also to be noticed that you have incorrectly listed limits for the restricted bands. Please correct.
10. Please provide a plot of the fundamental emissions for this device.
11. Please note the 15.249(d) states "Emissions radiated outside of the specified frequency bands, except for harmonics, shall be attenuated by at least 50 dB below the level of the fundamental or to the general radiated emission limits in §15.209, whichever is the lesser attenuation." This means that at the band edges the emissions from the device must either be 50dBc or must meet the limits for 15.209. Please provide evidence of band edge compliance for this device as stated.
12. Please review and correct the distance factor formula on page 8 of 9 (pdf page 14).

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.

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.