



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

August 25, 2007

RE: Trimble Navigation Limited

FCC ID: JUP-5935524-B1

After a review of the submitted information, I have a few comments on the above referenced Application. Depending on your responses, kindly understand there may be additional comments.

- 1) FYI...We understand your response regarding labeling. However due to increased FCC concern over inappropriate labeling and TCB's being too lenient on these issues, we have submitted the labeling issue directly to the FCC to obtain final approval for this case. We will let you know if there is any concern from the FCC.
- 2) This device has been requested to be Certified as a whole unit, not a module. Therefore complete internal photographs showing the top/bottom of all boards must be provided (see previous comments 6 & 7). It still appears that we are missing many photographs. This should also include a photograph of the Bluetooth with shield removed. Please provide.
- 3) There seems to be some level of misunderstanding regarding the applicability of modular data to other submissions. The submission is being done for the entire device, not just a module. Therefore spurious emissions must be supplied as applicable to the entire device. From lab experience I have seen where placing a previously approved module into another device can affect spurious emissions either beneficially or negatively. Use of the modular approval would require appropriate labeling of the device as required by the modular approval requirements. However approval of this device as a whole device would allow use of only the antenna conducted tests. Radiated tests would need to be performed for the entire device since this is what is being approved. Since this is my understanding I have further discussed this with Rich Fabina and Dennis Ward. Both also agree that for purposes of this application that the antenna conducted tests may be used, but that new spurious emissions data should be provided. This means that previously comment 12 & 13 do not appear to be adequately addressed. Please note that while the FCC does not require simultaneous TX to be submitted, but the applicant/lab is still responsible for ensure the device is compliant under simultaneous TX. For purposes of spurious emissions here – each TX activated independently is sufficient. If the manufacturer only wishes to address RF exposure, then possibly doing Change of ID's to the previously approved modules (to place into Trimble's Name) and then a PC to add co-located RF exposure is the route to pursue. This will give 2 FCC ID's that may be treated as modular approvals. However to re-approve under a single FCC ID requires appropriate radiated data.

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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](http://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.