



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

April 14, 2007

RE: Trimble Navigation Ltd.

FCC ID: JUP69991

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Please provide a block diagram specific to the WiFi and the Bluetooth devices. It would be welcomed if these were two separate files.
- 2.) Please indicate from the internal photographs where is the Bluetooth device and it's antenna, and the WiFi device and it's antenna.
- 3.) Under what authority does Greg Wallace speak for Trimble Navigation? The FCC database does not know this person.
- 4.) Since the FCC logo appears on this device, it is assumed that this device will qualify as a Computer Peripheral and subject to the terms associated with Declaration of Authority. In what country was this device tested for Part 15B radiated emissions?
- 5.) The Manual on page 2 seems to suggest that only the Bluetooth radio is responsible for radio frequency radiation. Since the WiFi device is nearly 40 times more powerful, shouldn't this be revised?
- 6.) Is it possible to have the Bluetooth and WiFi devices transmit simultaneously? It is unclear from the Manual if this is possible.
- 7.) When configuring this device to work in different countries, what WiFi channels become available?
- 8.) Since this device is capable of connection to a computer, shouldn't a computer be part of the test setup of both radiated and conducted emissions for Part 15B and 15C?
- 9.) Channel Power measurements are typically not sufficient in accuracy for RF power measurement whenever SAR is involved. Please provide measurements with sufficient absolute accuracy (5-10%) to meet FCC requirements for SAR testing. Please refer to test instrument manufacturer's specifications.
- 10.) Please provide evidence that all data rates were checked for highest peak RF Pout in both 802.11b and 802.11g modes.
- 11.) Please name the data rates used and shown for the radiated restricted band edge test.

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President and Director of Engineering

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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.