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

May 4, 2005

RE: BenQ Corporation

FCC ID: JVP56E13

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

1.) Kindly examine Section 1.7 of the Test Report. The values for voltage and current through the finals look funny. Are you saying that this device draws more power in standby than when transmitting?
2.) The power target values in the Tune Up procedure (pp. 13 and 14) exceed those found in both the Test Report and in the SAR report. Was this device tuned up properly before testing began?
3.) The conducted power on the SAR report (+29.6dBm) and the EMC report (+29.2dBm) exceed the allowable tolerance of 5%. Please review your data. RF conducted power for SAR report may be higher than the EMC report, but never greater than 5%.
4.) This device has the capability of being a computer peripheral when connected to a computer via the USB cable. Was this device also tested as a Part 15B computer peripheral? Should Certification or DofC apply? If DofC applies, then the FCC logo should appear on the label of this product.
5.) When used as a computer peripheral, the two-part statement of 15.19(a)(3) applies. Please review.

"This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation."

6.) The Information to User statement of 15.21 is missing. All Part 15 devices must have this notice.

"…changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment."

7.) The receiver portion of this Licensed transceiver needs the single statement of 15.19(a)(1). Please review.

"This device complies with part 15 of the FCC Rules. Operation is subject to the condition that this device does not cause harmful interference."

8.) Section 4.2 of the SAR report applies only to "standard" cellphones. This device does not easily fit this category. Kindly provide additional justification for both body worn and ear held test positions performed by the SAR laboratory. If possible, a diagram with an E-M grid showing the positioning for the head would be helpful
9.) Please describe in more detail the body positioning. It appears this device was tested inside a manufacturer's supplied "glove" or covering. Please provide a clear photograph of the cover. A description of the material would also be helpful.
10.) Was the body worn position tested both front and back? The SAR report does not clearly define the body worn test positions.
11.) The Manual proposes that third party body-worn accessories are satisfactory assuming they do not contain metal and maintain a separation distance of 1.5cm. Unfortunately there is no

test data to support this statement. Kindly provide body worn SAR data front and back with an air gap of 1.5cm.

William H. Graff
President and Director of Engineering

mailto: whgraff@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.