



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

January 24, 2005

RE: BenQ Corporation

FCC ID: JVP56E18

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

- 1) Please update the 731 form to include the emissions designator (300GXW) and Frequency Tolerance.
- 2) Please provide an operational description exhibit.
- 3) Please provide agency authorization letter.
- 4) Please provide a Parts list for the radio portion of the device.
- 5) The cover letters only ask for confidentiality on the schematics. However, typically for a cellphone, this also includes Block Diagrams, Technical Descriptions, Parts List, and Tune Up Procedure Information. Please provide or correct as necessary.
- 6) It is uncertain which label is the FCC label in the labeling exhibit. Please confirm. Additionally, it is uncertain if the label is placed on the battery or in the battery compartment or similar surface. Please confirm.
- 7) Please confirm if GPRS mode can operate while positioned on the head or can only operate in body worn condition.
- 8) GPRS power appears to be incorrectly reported as mW.
- 9) Please explain if more than 1 battery pack type is available for this device. If so, then SAR testing must be checked with both.
- 10) SAR report should reference FCC ID of device it is relative to.
- 11) SAR report should define if device tested is production unit or identical prototype.
- 12) Please provide further details in the report regarding the interpolation and extrapolation algorithms used by the system in area and zoom scans.
- 13) If available, please provide tissue parameters across frequency range of measurements.
- 14) What was the forward power into the dipoles during SAR validation measurements?
- 15) A statement of compliance to 1528 and §2.1093 does not appear to be provided in the SAR report.
- 16) For SAR Test dates do not appear on the plots. It can not be determined how many days testing was performed over. Note the FCC requires validation for each day of testing.
- 17) Z-axis plots do not appear to be labeled and it is uncertain which test they are associated with..
- 18) Users Manual information does not appear to address body spacing and limitations placed on body worn accessories.
- 19) Head conversion factors appear to be 3.65, but this does not match the plots. This may require retesting using proper factors. Please explain or correct as necessary.
- 20) Probe sensitivity given on the cal cert. does not appear to match the plots.
- 21) Body conversion factors appear to be 3.8, but this does not match the plots. This may require retesting using proper factors. Please explain or correct as necessary.
- 22) FYI...FCC logo is reserved only for specific types of approvals. This logo is shown on the AC adapter and it is uncertain as to why and how this logo applies to the AC adapter. Unless specific reasoning can be shown, this should be removed.
- 23) FYI...In the future, please show the actual measured occupied bandwidth on the plots (section 4.5 of the test report).
- 24) FYI...Please consider reporting the Measurement uncertainty in the SAR report for both the validation and normal test measurements.



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Examining Engineer

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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.