



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

December 7, 2003

RE: FCC ID: KBCIX260MPIA555BT
Attention: Rod Munro

I have a few comments on this Application.

1. Please note that the request for confidentiality states (Circuit Diagrams,, Procedure, Operational Description). Please verify if 'Procedure' is speaking of the tune up procedures.
2. Please note that in the 'Certification Action Requested' exhibit you state that the certification requested is for collocated 'portable' transmitters. Please note that the application is for mobile use in the laptop. Please explain.
3. Please note that each FCC ID application must stand on its own and references to existing grants or products is not sufficient. As such, each application must contain all of the appropriate information (ATCB cannot search the FCC website to find associated data, this data is required to be in the filing). Please note that reports for part 15 devices must be in accordance with ANSI C63.4. As such for each test result a report must provide the following data at a minimum:
 - a. Shall be clearly written, in unambiguous language (i.e. the test object must be clearly identified by model and serial number, etc).
 - b. A complete list of all test equipment used shall be included with the test report. Manufacturer's model and serial numbers, and date of last calibration and calibration interval, shall be included.
 - c. Test procedures used are to be clearly identified in each test.

Please note that the files 'Exhibit 6 MPI350 PSD.pdf' and 'Exhibit 6 MPI350 Part 15.247-6db BW_Ant Cond Spur.pdf', Exhibit 6 MPI350Band Edge.pdf do not clearly identify the device being tested, the procedures used nor do they provide information on the test equipment used (calibration dates, and equipment types, etc). Please clearly identify the device tested in these files (e.g. place the FCC ID number in the report, place the model and serial number of the device tested and place the test equipment information used in the report; alternately, place a cover page to the separate report addendums and place them in one file with the required ANSI C63.4 reporting information and explain why these files are relevant).

4. Please note that "Exhibit 6 Pt 15.247 MPI350 WLAN Test Report" states that for conducted power measurements the WLAN was tested in the "IX260 Rugged Laptop with Aircard 750 GPRS radio modem" but the actual device to be certified is with the Aircard 555. Please explain how this data is relevant to the device for which certification is being requested. Please provide the test date and the calibration date of the test equipment used.
5. From the plot on page 56 of the part 22/24 report (IX260MPIA555BT EMC Test Report Part 22-24 Rev1.pdf), it is unclear if the band edge at 849MHz is compliance. Please provide clear evidence that the device is compliant at this band edge.
6. The MPE calculations were apparently performed using the highest gain and no cable loss. However, as this has three transmitters were efforts done to project or estimated the MPE at various locations around the device to substantiate the calculated MPE?

Dennis Ward
<mailto:dward@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.