



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

April 23, 2005

RE: FCC ID: KE3IF101\_ATCB002329

Attention: Lou Feudi

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please provide a separate operational description for this device.
2. Please provide a manual with the necessary non-modification statement and user information statements in accordance with 15.21 and 15.105.
3. Please note that devices operating with a fundamental frequency below 30MHz MUST have radiated measurements performed using a magnetic loop antenna. Please note that, while you report lists a loop antenna in the equipment list, your setup photos show that a log periodic antenna was used. Please retest the device using the proper magnetic loop antenna for frequencies below 30MHz.
4. Please note that on the plot on page 13 of the report (page 15 of the pdf file) there are two similar appearing wave forms. The peak of the fundamental that you list is lower than the peak of the signal to the right of this supposed fundamental. Please note that if this is a signal from the device it fails as the fundamental is not the highest emission as required by 15.209c. Please explain this second signal and please verify that the fundamental is the highest signal in relation to ALL harmonics and spurious emissions from the device.
5. Please note that the 731 form states the fundamental is 18.7kHz however, the report on page 14 (page 16 of the pdf file) states the device fundamental is 19.5kHz. Please be consistent as to the operating characteristics of the device. Please correct as necessary.
6. Please note that while on page 17 of the report (page 18 of the pdf) you state that no emissions were found within 20dB of the limit, you must still show that no spurious emissions exceeded the fundamental regardless of the proximity to the limits. Please verify and provide evidence that no harmonic or other spurious emission was greater than the fundamental emissions.

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.