



August 30, 2006

RE: FCC ID: LJPRX-37\_ATCB003912

Attention: Kare Oksanen

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 note that the necessary SAR information has not been provided in the manual. Please provide a manual with the appropriate RF exposure information and cautions.
2. FYI – Please note that page 1 or the transmitter test report states “CFR 47, FCC rules Part 15 Subpart C, ANSI C63.4 (2003), IC standards RSS-GEN and RSS-210.” Please note that other than EUT and test equipment setup neither BT nor WLAN devices are tested in accordance with ANSI C63.4 2003. Please note that BT devices are tested in accordance with DA00705 and WLAN devices are tested in accordance with the new DTS procedures found in KDB558074. Please note that neither of these test methods are mentioned in the test report. As these two test procedures are the basis for which a TCB may approve this device, they must be referenced as the appropriate test methods. Alternately, each test can have a written explanation as to how they meet the requirements of these stated test methods. Please address this issue.
3. Please note that for WLAN testing all three power measurement test methods found in KDB558074 state that the resolution BW is to be a minimum of 1MHz and the video BW is to be greater than the res BW except in method 3 where it is to be greater than 1/T. Please note that the res BW shown for power measurements on pages 27 through 29 is only 300kHz and the video bandwidth is only 100kHz. Please retest using the proper test procedure, res BW and video BW. Alternately, please explain and provide adequate reason why the test results using the improper res and video BWs shown should be accepted (i.e. FFT analyzer characteristics etc).
4. Please note that while the test report gives the conducted rf measurement setup diagram on page 5, the actual power test data on page 26 does not state if it is conducted or radiated measurements. It is therefore only an assumption that the data is a conducted rf measurement. Please clearly identify the type measurement in the report.
5. In regards to item 4, please note that the SAR report uses EIRP power for the power measurements. Please note that as it is assumed that power in the 15C report is a conducted rf measurement, there is no correlation between the SAR and EMC power. Please note that the FCC is very specific about the SAR and EMC power being measured the same way and that they must be within 0.5dB conducted or 3dB radiated. Please note that a statement from the test lab that the power was set to max is **not** sufficient in this regard and powers listed in the SAR and EMC must match. Please either retest SAR using the conducted power method or please perform EIRP measurements and incorporate them in the EMC report.

A handwritten signature in black ink that reads "Dennis Ward". The signature is written in a cursive, flowing style.

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](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.