November 22, 2005

**RE: Siemens Automotive Corporation** 

FCC ID: M3N5WY7700

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

1) The FCC ID on the label shows a dash, while the 731 form does not. What is the correct ID? Please confirm and correct all necessary exhibits.

Our apologies, the exhibits have been corrected to include the dash.

2) It is uncertain of the actual positioning use of this device. Was is positioned properly on the table, or should it have been positioned with the key upward, or possibly examined in 3 axis? Please review and comment as necessary.

As discussed in the test report, section 5.1, emissions were measured for all orientations of the DUT and the test antenna. Please note we have pointed this out many times in the past.

3) Compliance with 15.209(c) can not be assured given results reported. Harmonic at 375 kHz is > Fundamental.

As demonstrated in Figure 6.2 in the test report, the emissions from the harmonics are significantly lower than that of the fundamental emission. Please also note that the DUT emissions in general are more than 80 dB below the limit.

4) Please comment on if the 99% bandwidth was measured using IC techniques as specified in the attachment previously provided? Additionally, it does not appear that the measurements meet with the requirements of using RBW > 1%, VBW > 3\*RBW and NO Video Averaging? RSS-GEN, section 4.4.1, issue 1. Please correct the IC form as necessary.

The bandwidth was measured appropriately. No video averaging was used and the RBW is > 1% of the span. As per the VBW, we have double checked the emission measurement and found no variation in the 20 dB (99%) bandwidth, thus no corrections are necessary.

5) From the new issue of RSS-102, an attestation should be provided for all devices. Please see updated form attached.

The attestation has been included in the application forms.