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

June 19, 2002

RE: FCC ID: M3N5WY7078
Attention: Valdis V Liepa

I have a few comments on this Application.

1   The limits in the table of emissions on page 6 of the report are incorrect. While the device appears compliant when compared to the proper limits, the report needs to reflect the appropriate limits. 125kHz limit at 300 meters is 25.6dBuV as shown, and while 1250kHz at 30 meters is also approximately 25.6dBuV as shown, all other limits listed are incorrect. Please use the formula provided in 15.209 for the proper limits. Please provide a report with the corrected limits.

2   Also, 15.31 allows either a multiple measurement method or a 40dB/decade roll off for extrapolating data. This means that each frequency may be measured at multiple distances and a 'best fit' straight line drawn between the results to the limit distance may be done, or the FCC's stated 40dB/ decade value in 15.31 must be used. This means the calculations in the table are incorrect. While correcting the data to reflect the proper readings show the device compliant, the report must still reflect the proper data as related to the limit. Please correct the data and refer to the proper limit.

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.