



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

May 5, 2006

RE: SCM Microsystems

FCC ID: MBPPAT1322-0300

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Please provide an agent authorization which allows EMCE Engineering to act on behalf of SCM Microsystems. Otherwise, we will have to have the Confidentiality request and Form 731 signed by someone in authority at SCM.
- 2.) There are two labels provided with two different FCC IDs, yet the Test Report appears to apply to both of these products. Both of these products are electrically identical, with the exception of the PIN pad. Therefore there is no problem grouping both PAT1322 and PAT1312 into one Application labeled with a common FCC ID. Otherwise we will have to perform two filings and produce two Grants of Equipment Authorization. And in order to keep all filings ordered, we will have to break apart this single filing into two with another upload to the ATCB website. Let me know which way you wish to proceed.
- 3.) The Test Report is required to be identified with the applicable FCC ID.
- 4.) Loop antennas require three positions for testing: perpendicular to the EUT, aligned axially with the EUT, and parallel with the ground. Were all these positions tested?
- 5.) Kindly extrapolate your test results to the limit distance. I recognize that these are very low level signals and they were taken at 1M, but still we need to show compliance to the specified 30 meter distance.
- 6.) Kindly review the Equipment List (page 44). It appears several pieces are out of calibration.
- 7.) There is no measurement bandwidth information on the plot provided on page 31 of the Test Report. Kindly provide RBW/VBW settings and sweep time.
- 8.) Is there any data available for the 2nd harmonic? I see the fundamental emission, and emissions above 30MHz, but nothing to indicate any measurements of the 2nd harmonic. Please review.
- 9.) The Manual is missing the required FCC compliance information. Specifically Rule 15.21 which states "...changes or modifications not expressly approved by the party responsible for compliance could void the user's authority to operate the equipment."
- 10.)

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President and Director of Engineering

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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.