



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

February 6, 2007

RE: FCC ID: MIVGSM0308_ATCB004517
Attention: Tom Tidwell

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 FCC states that the actual frequencies used are to be on the grant. This means that for this application the following frequencies are to be on the grant: 824.2-848.8MHz and 1850.2-1909.8MHz. Please correct the 731 to reflect the actual frequencies for this application.
2. Please explain if this is a licensed modular transmitter application.
3. Please explain how the label is permanently attached to the device.
4. Please note that it appears that the manual uses 7watts for the part 22 MPE information. Please note that this is not correct. Please note the highest gain antenna usable for this device under part 22 MPE at 824.2MHz to keep the 20cm separation would be 2.1dBi ($32.3+2.1=34.4\text{dBm}$ or about 2.75W. For the part 24 MPE the highest gain antenna usable would be about 5.8dB. However, as noted in the manual, the limiting factor at 1999MHz PCS is the 2W eiro allowed for mobile devices. This means that the highest gain antenna usable for the part 24 configuration would be less than that of the part 22 configuration or about 1.84dBi. Please correct the manual to reflect the actual maximum antenna gains for this device.
5. Please correct your MPE reports to reflect the actual measured antenna conducted power from the report. For part 22, as the highest power was measured at the 824MHz end and since this is the lower MPE rating this would be a power of 32.3dBm and an antenna gain of 2.1 and for part 24 this would be a power of 31.17 and a max antenna gain of 1.84dB.
6. Please note that the part 22 radiated spurious emissions data appears to be in EIRP and not ERP as required by the rules. Please correct the data to show ERP values for part 22.

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.