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

June 29, 2006

RE: FCC ID:MQOTT700-20000_ATCB003663

Attention: Kathy Grzovic

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 FYI – please note that the FCC ID number including the term "FCC ID:" should be together. The label has the ID number in a box, but the term FCC ID: outside the box.

Response: Noted, and applicant informed, thank you.

2 Please note that the SAR statement in the manual does not address the actual maximum SAR level nor does it address the use of only those accessories tested for body worn use. Please note that the FCC has stated that these items should be addressed in the manual. Please consider addressing the restriction to use only provided/tested accessories.

Response: The SAR level appears on page 2 of the manual exhibit; please see revised manual exhibit uploaded with this response for accessories statement.

3 Please note that IEEE1528 states that the actual drift should be listed in the uncertainty budget. Please note that the power drift listed in the SAR report exceeds 0.86 dB (approximately 22+% which is significantly more than the allowed 5% drift. This is an unacceptable drift uncertainty. Other than stating the power drifts were measured, the SAR report does not appear to address this drift (i.e. scaling, SAR vs time, etc). If this is addressed in the report, please point to the exact page. Please explain and please address the 22+% power drift shown in the data.

Response: Please see the explanation provided by Celltech Labs, uploaded with this response.

4. Please note that the conducted power of the WLAN device is 19.9dBm in the EMC report and only 18.1 in the SAR report. Please note that the FCC has stated that the power measured between the SAR and EMC report must be less than 0.5dB for conducted power. Please also note that as the EMC report states 19.9dBm (98mW) and the SAR report only show 18.1dBm (65mW) the SAR data must be retaken using the highest power from the EMC report. Please retest SAR using 19.9dBm as the power out level of the device.

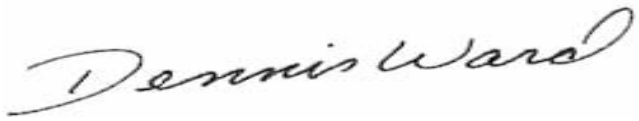
Response: The incorrect SAR report was inadvertently uploaded with the application. Please see the correct SAR report uploaded with this response.

4 Please note that page 14 of the report states that peak radiated for the BT was 98.4dBuV/m and average was 97.9dBuV/m. I would expect the average reading of a properly modulated and hopping BT device to be greater than 0.5 dB. Please explain.

Response: Please see the revised test report uploaded with this response.

5 Please note that radiated emissions in the restricted band for a BT device is to be made with the device hopping as well as non-hopping. This is inferred by the statement from the procedure that also allows the use of further reduction using the duty cycle correction factor for a device with a channel dwell time less than 100ms. Please address restricted band emissions data with the device in full hopping mode as indicated in DA00705.

Response: Please see the revised test report uploaded with this response.



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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.