



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

April 27, 2004

RE: SOLOMON Technology Corp.

FCC ID: NITSCWI275U

I have a few comments on the above referenced Application.

General Requirements

- 1) Note that the operational description states that the device supports Class 8 GPRS, but is Class 10 GPRS capable. Please clarify. Is the device capable of both? This become important during the SAR review
- 2) The device operational description also mentions GPRS/Edge Modulation capable, but it is uncertain if the device actually uses both? Please explain and clarify which bands of operation use which modulations.
- 3) Note that normal GSM is typically listed as 300KGXW while edge is listed as 300KG7W for the emissions designator. Please update the 731 form for all the proper emissions designators that this device will use for the Part 22/24.
- 4) Plots Referenced in the 15.247 report Appendix B do not appear to be provided. Please provide.
- 5) Please provide a description of all circuitry and devices provided for determining and stabilizing frequency, for suppression of spurious radiation, for limiting modulation, and for limiting power.
- 6) The users manual does not appear to include the necessary statements for 15.21. Please show where this may be found or provide a modified manual.
- 7) Page 76 of the manual should define whether the device meets with Class A or B emissions. Please adjust.
- 8) The users manual does not appear to contain any RF exposure information.
- 9) The values on the 731 form for Part 22 and 24 do not appear to match the test report. Part 22 should be listed as the maximum ERP value and Part 24 the maximum EIRP value measured.
- 10) The data on page 33 & 34 of the Part 22/24 report is not clear what channel was being tested. Please explain.
- 11) The frequency stability shown on the 731 form does not match the worse case value measured. Please correct.
- 12) SAR Report shows a crest factor of 8, while the device is capable of Class 10 (see question 1 above). Please explain and/or update the SAR report as necessary.
- 13) Please explain the crest factor of 8.3 vs. 8.0 or 4.0 given in the SAR report.
- 14) The 731 form shows FCC ID: NITSCWI275U, while all other information in the application shows FCC ID: NIT-SCWI275U. Please clarify which is correct and correct the appropriate exhibits.
- 15) The maximum power rating given on page 5 of the SAR report for GSM 850 appears incorrect. Please review and correct if necessary.
- 16) It appears for SAR that the top/bottom/side opposite antenna were tested. Was the side nearest the antenna investigated? Please comment and/or justify not providing data for this configuration. Was it pretested?
- 17) It appears that the data for i_Buddie, NM BTM Touch should be a SAR value of 1.0, but is not listed in the table as this. Please review/correct as necessary.
- 18) The SAR report should report the report probe tip distance to phantom inner surface during scans. Please update the report to include this.

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- 19) The users manual should include information regarding be tested and meeting with RF exposure regulations. Note that the statement regarding 2" does not meet with tested conditions. Please update or show where this information may be found.



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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.