



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

October 16, 2007

RE: FCC ID: NPKAVC922_ATCB005537
Attention: Tetsuo Maeno / Kanako Sanda

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 tables one and two on page 38 of 56 in the test report show a failing readings (i.e. over the elected limit). However, if properly compared to the correct limit for this frequency (2400MHz) the device appears that it would pass. That however is not the issue. The issue is that you have a report showing failing data referenced to the wrong limit. Please correct the tables to provide a test report with no failing readings listed.
2. Please note that the 99% OBW plots do not show the typically accepted dBc points allowed by Industry Canada but instead possibly incorrectly show lesser attenuation points due to inherent internal settings and assumptions. While the bandwidths listed are reasonable for such devices, please confirm that the engineer is aware of the possible errors introduced by the analyzers having an OBW 'button' and that this was considered when reviewing the reports for accuracy and appropriateness of data. Please explain how the engineer verifies this type data so that
3. Please note that the 20 cm separation requirement is not a 'should' but is a 'must'. The statements in the installation manual and operators manual need to reflect this condition. Please consider modifying the language to reflect the FCCs requirement the a minimum 20 cm separation is a must.
4. Please note that in communication with the FCC they have stated "For FCCIDs with Limited Modular Approval, **grantee shall evaluate radiated spurious emissions** to determine whether Class I or Class II permissive change is applicable for module used **in different final product configurations** ." As you can see this indicates that the FCC wants radiated emissions inside the host to be considered and reported. Please note that this is not a full modular approval where stand alone radiated emissions testing is also required, but is a limited modular approval for use inside a specific host or set of hosts. Because the module does not contain it own power regulation, it is not known what affects this may or may not have on radiated emissions inside a host product. Please address this issue.

Dennis Ward
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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.