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

May 16, 2006

RE: FCC ID: NTAFP102TA_ATCB003429
Attention: Alex Usoskin

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 731 states only one frequency of operation (915MHz) yet the operational description states the device operates between 902-928MHz. Non-multilateration systems have subband edges at 909.5 and 921.75MHz. As the device is said to have a band edge that is only .2dB under the limit, the use of any frequency below 915MHz (914.86 as shown on the plots) would appear to cause the device to fail. Please explain if this is a single channel device operating at 915MHz only or if other channels are also used. If other fundamental frequencies are used, please show band edge compliance using the lowest and highest frequencies.

2. Please note that the operational description states the device is a software programmable radio. Please verify that this does NOT mean the device is a software defined radio as defined by the FCC (i.e. a radio that includes a transmitter where operating parameters of frequency range, modulation type or maximum output power can be altered by making a change in software without making any changes to hardware components that affect radio frequency emissions.).

3. Please provide a manual that includes rf exposure information.

4. Please provide an MPE evaluation report for this device.

5. FYI – please note that with a narrow band signal the occupied bandwidth should be measured using a resolution band width that is about 1% of the emission bandwidth, or with an analyzer setting as close as possible but not less than the 1%. This means the OBW plots for this device would be more accurate using a resolution bandwidth of 300Hz. The use of a larger resolution bandwidth does not put the analyzer in the proper measurement mode (i.e. the analyzer should be measuring the individual spectral lines (frequency spacing) of the emission and not the whole spectral content). The OBW plots provided show the spectral content but do not show the individual spectral lines produced by the modulation. You should consider redoing the data using a resolution bandwidth of perhaps 300Hz to 1kHz.

6. Please note that on page 14 of the report in 7.3.2.1 you state that the antenna out was connected to the analyzer per 7.3.1; yet the test results indicate ERP measurement. Please explain and please provide a report which correctly explains the test method used.

7. FYI - Please note that licensed devices generally measure power. Please note that dBuV should be converted to dBm for proper reference.

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.