



American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

April 26, 2004

RE: FCC ID: O2E-ILR-ICARDIII

Attention: Kathy Grzovic / Desmond Fraser
I have a few comments on this Application.

1. On the second to last photo in the internal photo exhibit, in the upper left corner, there is an undetermined component/shielded area. Please explain and or remove the shielding and show the board underneath.
2. Please note that the manual states that maximum output for this device used in North America is 24dBm. This is about 250mW. Please note that 15.245 limits are in field strength (dBuV/m). For 902-928MHz this correlates to 113.98dBuV/m or 6.98dBm at 3 meters (assuming a 50 Ohm system). Please also note that as the limit is a field strength limit, this maximum level would include any gain of any antenna used. It is not stated as to how the power listed in the manual and the measured values relate. Please verify that the information in the manual is accurate and representative for this device and is in line with actual allowed and measured values.
3. Please note that section 1.1 (page 5 of the test report) states that you modified the power settings of the device in order to test the YAGI antenna. Please note that as this is not a professionally installed device, this user power adjustable configuration is not allowed (see 15.15b - "An intentional or unintentional radiator must be constructed such that the adjustments of any control that is readily accessible by or intended to be accessible to the user will not cause operation of the device in violation of the regulations.") This means the user cannot have access to any controls, firmware or software that would allow the device to exceed its maximum output or frequency range. This also means that the maximum output at the time the YAGI was used is the maximum output for the device under all configurations and antenna(s). Please explain how the manufacturer intends on limiting the device output so it does not exceed this level. Also, please test the other antenna configurations using the same maximum allowed output as used with the YAGI antenna. Alternately, please explain how this device is professionally installed so as the various power levels and antennae configurations do not violate the maximum field strength levels for all antenna configurations.
4. Please note that the technical specification / operating description states that there are 4 antenna types used with this device (monopole, dipole, patch and YAGI). Please verify if the 1.4wave data in the report is meant to be for the monopole antenna stated in the operational description. If this is not the monopole, please test the monopole antenna specified.
5. Please provide the email between Jon Hughes and Tim Harrington of the FCC mentioned in the rf exposure exhibit if available.

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.