

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

July 23, 2003

RE: UTStarcom, Inc.

FCC ID: O6YUTS-700U

After a review of the submitted information, I have a few comments on the above referenced Application.

1) Digital device data was submitted for radiated emissions. Please confirm that AC power line conducted emissions has also been performed.

EMC Report

- 2) The test photographs provided appear to be for 2 different devices. Please review and explain.
- 3) It appears that information on this system from UTStarcom's web site states that radios for this system can come in 10 mW, 200 mW, and 500 mW average powers. Please confirm that this device was tested at its maximum setting.
- 4) The EIRP shown in Table 4.5 appears to be incorrect for channel 25. Please verify as it appears this should be 18.6 dBm EIRP.
- 5) Please explain the EIRP on the 731 form of 0.112 Watt EIRP. It appears this should be 0.098 mW
- 6) It is not clear if the air interface is strictly TDMA. While the emission designator 271KDXW appears to be for the TDMA please explain if the device is capable of transmitting in any other mode.
- 7) The device appears to function from 1893.65 1909.85 MHz which matches previous approvals for this applicant, while the web site for UTStarcom appears to state 1895 to 1918.1 MHz. Please confirm and explain the lowest and highest channels used by this device.
- 8) The margins shown in table 6-3 do not appear to be properly calculated for all entries except the first one. Please verify and/or correct as necessary.

SAR Report

- 9) The verification frequency(s) should be within ± 100 MHz of device center frequency(s), however the 1800 MHz dipole falls just outside this (1901.75 MHz). Please explain.
- 10) Typical TDMA phones use a crest factor of 3. However the crest factor given in the report is 14% (7.1). Please provide measurements and/or appropriate information to support the use of 14%. Additionally, is this worse case duty cycle?
- 11) The manufactures dipole information appears out of calibration (almost 2 years old). Please explain.
- 12) The users manual mentions body worn operation (page 10), but information regarding body testing has note been supplied. Additionally, the users manual should clearly label the
- 13) The users manual (page 14) mentions a NiMH battery, while only a Lithium Ion appears to have been tested as stated in the SAR report (various pages). All batteries must be tested. Please explain.
- 14) It appears that the device was tested for power output via EIRP method. Did this device not have the capability to be tested via conducted power? Note that conducted power was listed in the EMC report.

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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

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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.