## American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

April 26, 2001

RE: Topaz FCC ID: 07KTK514

I have the following comments on the above named application:

 To begin, no RF exposure information was received. Therefore I am evaluating it as Transmitter Category VIII (a) equipment according to the TCB RF Exposure Procedures document of Nov .15, 2000 and the TCB exclusion list of December 18, 2000

The device should evaluated in accordance with Section VII of the TCB RF Exposure Procedure. This device is considered a mobile radio per Part 2.1091.

2.) Test report cover page claims .4W ERP. Manual claims .5W. Section 6.1.1 in test report claims .363 watts. There must be agreement with all exhibits.

Manual and test report have been revised.

3.) Measurement uncertainty of +/- 1.5dB is appropriate for OATS measurements, but too much for radiated power measurements using substitution method. Variances of less than 0.5dB would be more appropriate. Please address.

Test report has been revised to account for a +/- 0.5dB measurement uncertainty. Section 6.1.1

4.) TCB Transmitter Exposure Procedures document Section VIII (a) of Nov. 15, 2000 excludes devices above 400mW. Converting your measured ERP to EIRP puts you at almost 600mW. Please address.

Section VII of the TCB RF Exposure Procedure is to be used. Please refer to Item 1. The device meets the categorically exclusion limits per Part 2.1091.

- 5.) FYI: It is preferable for all narrowband emissions using 12.5KHz channel spacing to use a SA span of 50KHz
- 6.) FYI: Please separate unmodulated from modulated plots. It is difficult to read when both are crammed on one display and printed on a black and white printer.

Noted: Please buy a color printer as this will be easier for you to identify color coded data.

William H. Graff Examining Engineer

President and Director of Engineering mailto:whgraff@AmericanTCB.com

William

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.

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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.