



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

September 29, 2005

RE: Palm Inc.

FCC ID: O8FJIMI

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

Admin

- 1) A 731 form addressing the following concerns does not appear to be provided

The frequency ranges should be 824.7 – 848.31 & 1851.25 – 1908.75 MHz. Frequency of Bluetooth should be 2402-2480 MHz. Worse case frequency tolerance emissions have changed with the updated Part 22/24 report. Please adjust the 731 as appropriate for all items given.

- 2) The latest confidentiality letter does not include block diagrams (i.e. there is a system block diagram that will be uploaded for Part 15 part of the application). Please adjust to include.
- 3) An updated temp confidentiality letter listing SAR test photos and removing test reports has not been received.
- 4) Please provide an operational description as previously mentioned.
- 5) Please confirm that the EMC photos provided separately do not need short term confidentiality.
- 6) The users manual mentions an option for use with an SDIO card. This does not appear to be covered by this application, nor can a TCB currently process this due to certain SAR issues.
- 7) FYI...Most IC information was sent under a separate cover.

Part 22/24 Report

- 8) The newly provided bandedge emissions with higher RBW and VBW settings are actually lower than previous data. This seems unexpected without reasonable explanation. Kindly provide an explanation as to why the larger RBW and VBW settings are actually showing lower results.
- 9) The updated appendix does still appear to show Part 15 radiated results for < 1 GHz. Part 15 limits are not part of 22 or part 24. Please provide data that shows compliance to the substitution rules/limits of Part 22/24. If prescan measurements show > 20 dB below the Part 22/24 limits then these need not actually be tested under substitution conditions, however the tables should adequately show a comparison.. Additionally, please note that Part 24 spurious requires 1 MHz RBW which does not appear to be applied. Additionally, it is not sure how one table is showing compliance to both part 22 and part 24 spurious < 1 GHz. Please adjust as appropriate.

Part 15.247 DSS Report

- 10) Hopping rate appears miscalculated on page 25. Please evaluate. See attachment for further information.
- 11) For IC, spurious emissions for the RX must also be shown.

HAC Report

- 12) FYI...HAC will be sent under a separate cover.



Examining Engineer

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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.