



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

November 3, 2005

RE: Jakks Pacific (HK) Ltd.

FCC ID: OTARC73630T49

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

- 1) Please confirm that confidentiality is not required or requested on any exhibits.
- 2) The FCC ID shown on the FCC labeling exhibits appears incorrect. Please review and correct.
- 3) The test report supports compliance to Part 15, however Part 15 specifies the limits and requirements. Test methods should follow ANSI C63.4-2003. Please ensure the device has been tested with this standard and update the report as necessary.
- 4) ANSI C63.4 specifies that a portable device must be tested while positioned in each of 3 axis in effort to obtain worse case results. The report photos and the report page 7 suggests maybe only 2 positions were tested. Please review and correct as necessary.
- 5) For field strength measurements > 30 MHz, a RBW > 100 kHz (typically 120 kHz EMC bandwidth is used) must be used. Measurements suggest a 9 kHz RBW was used (page 8 of the report).
- 6) Please confirm RBW used for spurious field strength measurements made > 30 MHz.
- 7) It is uncertain if the Antenna Factors are figured into the calculations or measurements made. Because of the low results obtained, we are trying to confirm that the measurements were properly adjusted for Antenna factors, cable loss, and amplifiers. Please confirm.
- 8) FYI (For Your Information)...Peak measurements appear to meet Average limits. However if the peak measurements had exceeded the average limits, further information regarding the modulation may have been necessary. For instance is the carrier pulsed in nature? If so, then average measurements are actually not a measurement, but simply the peak measurements corrected for worse case duty factor (following 15.35(c) of the rules). Note that most of these types of devices do actually contain pulsed emissions.

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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.