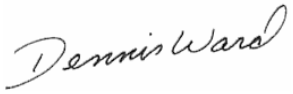
American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

February 4, 2004
RE: FCC ID: OU4-XPC900
Attention: Mike Royer

I have a few comments on this Application.

1. As part of the ATCB quality control and for help in tracking of an application, a competed 731 form is needed. Please note that the provided 731 does not list the equipment code for this application. Please provide the requested equipment code under section 4a of the 731.
2. Please provide the description of the device in section 4b of the 731 as it will be on the grant. Otherwise the name of this device as listed on the grant will be "**XPC900 PCI Card and Auxiliary Unit".**
3. Please note that no letter of confidentiality has been provided, thus all exhibits will be open for public view. If you wish confidentiality of the schematics, block diagram and theory of operation, please submit a request for confidentiality letter.
4. Please note that the block diagram does not clearly indicate what the transmitter fundamental operating frequency is. It lists several frequencies, but does not specify the frequency delivered to the antenna. Please specify.
5. Please note that the operational description says that this is a receiver and does not mention an intentional radiator. Please provide an operational description of the intentional radiator part of this device.
6. Please show how you derived the "averaging factor" shown in the data sheets (i.e. plots of the duty cycle over 100ms and the calculation etc).
7. Please note that you show a detector function of "Average" on the fundamental data sheets. Please note that 15.231 devices that are pulsed must use the averaging technique specified in 15.35, not the averaging function on the analyzer. Please explain.
8. On page 17 of the report, 232MHz has no limit listed. Please include the limit for this frequency in the table.
9. Please note that 15.231 devices using pulsed emissions must be averaged using the pulse width averaging technique specified in 15.35 and are not averaged using an average detector. This applies for all spurious emissions even those above 1GHz. Your report indicates that above 1GHz an average detector and not the averaging specified in 15.35 was used. Please also note that because of this and the fact that an average detector may yield a different value than the averaging method under 15.35, the actual peak value of several frequencies above 1GHz may actually exceed that of the fundamental and thus the corrected average and/or peak values for 1254MHz may fail. Please also not that under no circumstance can the peak, QP or average values of any emission exceed the recorded peak, QP or average value of the fundamental. Please report the peak readings of emissions above 1GHz and then use the calculated duty cycle averaging value to derive pulsed width averages. Alternately, please record all values of Peak and QP values for comparison to the requirement of 15.209c.
10. Please provide evidence that the device meets the automatic or manual turn off requirements of 15.231a2&3. This is generally done in the operational description.



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.