



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

May 24, 2004

RE: FCC ID: OU4-XWC900_ATCB001348
Attention: Mike Royer

I have a few comments on this Application.

1. Please note that 15.249 is an average limit above 1GHz. Please note that the test report indicates the measurement distance is 3 meter (page 16). Please also note that since the measurement distance was 3 meters the 20dB over peak would be 113.5 not 123.5dBuV/m. It is not sufficient to state that you passed the 20dB over the average limit as you must first comply with the actual average limit. The use of peak measurements alone is only valid when the peak measurement does not exceed the average limit. If it does then mandatory peak and average measurements must be made to show compliance to both the average limit and the 20dB over average limits for peak. Please note that as an average of the vertical 101.6dBuV/m reading has not been done, the device is considered to fail. Please provide the required comparison to the averaged limit of 93.5dBuV/m to 15.249.
2. Please note that the report states, "The transmitter automatically shuts off following the 19mS encoded message". However, it does not appear that it has been made that the device shuts off for the minimum mandatory time set in 15.231e. Please provide clarification on this issue in the report
3. FYI – no action needed. When no spurious emissions are found, it is good practice to at least report the noise floor on several readings to confirm the noise floor is not masking potential failing readings.

Dennis Ward

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.