



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

May 13, 2004

RE: FCC ID: OU4-XWS50M_ATCB001335

Attention: Mike Royer

I have a few comments on this Application.

1. Please note that the 731 only addresses the 418MHz transmitter under 15.231. The report indicates that there are two transmitters in this device, one 418MHz and 2.4GHz. In this case the application would be a composite under two distinct scopes (A1 and A2). Also, please note that the test report does not address the 2.4GHz transmitter Under 15.249. If this is part of a composite application that is already at the FCC or already granted, please verify. Otherwise, please explain and please provide the necessary data for compliance.
2. Please note that you use incorrect limits for the field strength limits on page 12 of the report. The test distance is said to be 3 meters. AT 418MHz 15.231 limits would be 80.2uV/m. Please correct your report to compare measured values to the correct limits for 3 meters.
3. Please note that your duty cycle plot is not in accordance with 15.35 which states that the pulse train is to be measured over 100ms. Please note that you have only shown 50ms. Please provide a corrected plot showing the full 100ms reference sweep time.
4. Please note that the device appears to fail radiated spurious emissions at 1254MHz. Please note that $20\log(1250\text{uV/m})$ is 61.9dBuV not 63.5dBuV. Even if the limit is rounded off to 62dBuV/m the margin would then be 0dB. However, since the 20log number is less than the measured, technically the device fails. The device is most likely compliant when the pulse width duty cycle averaging is done. However, as this was not provided the measured peak must be used in evaluating the product. Please provide results showing clear compliance of the device using pulse width duty cycle averaging. Also, please derive this factor using the required 100ms time frame and not 50ms.

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.