



# American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

July 8, 2002

RE: FCC ID: OVFKWC-5135

Attention: Robert Scodelaro

I have a few comments on this Application.

## TEST REPORT

- 1 The photos on pages 8 and 9 of the internal photo exhibit are unreadable. Please provide the photos on pages 8 and 9 in a readable clear form.
- 2 Page 5 of report SC203272-03 shows EIRP. However, there is no indication on this table if the data is for Part 22 or Part 24. Please be specific in your reports as to what Part the data applies. Please correct the report to show the proper values for the specific Parts to which compliance is being claimed.
- 3 Spurious emissions for Part 22 should be in ERP and for Part 24 they should be in EIRP. The report does not clearly indicate how you performed antenna substitution measurements or if it was done. Please provide a detailed explanation of your ERP and EIRP measurement methods.
- 4 Please separate the attestation and cover letter statements from the report. (e.g. the ESN statement, test setup photos and confidentiality statement needs to be separate files). Please note that the request for confidentiality is not signed.
- 5 The Audio Frequency curve on page 19 is labeled as 22.917 – this is the Emissions Mask requirement. Please correct the report to reflect the proper paragraphs.
- 6 Your occupied bandwidth plots in AMP voice mode are not done using a span that easily allows Bessel function analysis to determine if the correct 2500 Hz tone was used. Please provide plots using the correct 2500Hz tone for voice mode with a small enough span (100 or 50kHz) to allow Bessel function analysis, or please explain why the plots do not reflect the expected characteristics of an AMPS 2500Hz audio tone. Also, it would help if you completed the plots by providing a superimposed bandwidth mask.

## SAR REPORT

- 1 Page 6 of the SAR report states body worn accessories are listed. However, no such list is given on this page. The SAR report must specify the accessories used when tested. These must be the same as listed in the manual. However, no such specification has been given in the SAR report or the manual. Please provide the model number of the holster used during testing.
- 2 The model number of the battery used needs to be specified and must be the same as in the manual. However, no such specification has been given in the SAR report nor the manual. Please provide the model number of the battery.
- 3 While the SAR report states that it was done for compliance to RF exposure to 2.1093, it does not state that it is in compliance. The FCC has stipulated that a statement of compliance to the RF exposure limits must be in the test report. Simply stating that testing was performed to 2.1093 is not an actual statement of compliance to 2.1093. Please provide a statement affirming compliance to 2.1093 in the SAR test report.
- 4 Was the device tested a production, pre-production or prototype device?

- 5 The data plots do not have the ambient and liquid temperatures. Please provide if available.
- 6 The values for power-drift range from +0.41 to -0.39 on the measurement plots. This is a power device power drift of more than 0.7dB or more than 5%. This means that the actual power of the device during testing may have exceeded the 5% variation allowed between SAR power and Part 22/24 reported power values. Please explain the why this should not be of concern.



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.