



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

June 2, 2007

RE: FCC ID: OWDTR-0048-E\_ATCB004984  
Attention: Kathy Grzovic

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that the FCC extended frequency band listing requirements state, "Portion of band must not be used solely for a rule part not applied for unless justification in (e), below, applies. Consider splitting rule parts in different line items to remove ambiguity if needed.... For multiple rule part line item, tighter specs must apply where frequency ranges are common between rule parts." It goes on to say, "The filing must have a justification letter for extended frequencies outside of applied rule part. Operation must be justified under 2.807. For example, Government / Military use or exportation to other countries has been allowed. Justification letter from grantee must indicate marketing plans to ensure USA users, other than those specifically identified, cannot operate device outside bands allowed under the relevant rule parts applied for." Please note that neither part 90 and part 22 do not appear to have any contiguous operational frequencies between 136 to 150.8MHz. Because the frequency gap from 136MHz to 150.8 is greater than 1/2MHz, this means that the extended frequency band below 150.8MHz cannot be used on an FCC grant for parts 90 or 22. Please revise the 731 form to be in line with the latest FCC extended band listing policy. Alternately, please reference the specific sections of rule parts 90 and 22 that allow operation in the range (136-150.8MHz) mentioned above. Please reference section 2.106 of the FCC rules for specific frequency banding information.
2. Please note that the FCC extended frequency band listing policy for testing states, "Test only on allowed frequencies." Please note that 143MHz is neither a part 90 nor a part 22 frequency. Please note that in the event justification for the use of 136-150.8MHz can be given, you will still need to retest the device on an actual part 90 and part 22 frequencies. Please retest accordingly.
3. Please note that as of June 2, 2007 RSS119 issue 7 is not a valid test specification. Please retest and/or verify that all testing for Industry Canada is in accordance with the new RSS119 issue 9 specifications.
4. Please note that based on the results of the revised data provided in accordance with the above items, further review comments may be forthcoming.

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.