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

January 24, 2007

RE: Mitac International Corporation

FCC ID: P4Q-MIOC720

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

1.) FYI: Please be so kind as to double-check the contact information listed on our Form 731 and compare it to the Grantee code contact information at FCC website. Please refer to Rule 2.929, which requires that the FCC be notified within 30 days of any name and/or address change.
2.) FYI: Please make sure Roy Hsu is listed as contact at the FCC database. Either that or make sure the responsible party at Mitac authorizes in writing Roy Hsu to act on behalf of Mitac. The FCC website is down this morning so I am unable to verify today myself.
3.) The Internal Photographs are too small and not clear enough to be useful. I am unable to determine what or where exactly the Bluetooth transmitter is located. Remember – this Application as presented is for a transmitter only. Rule 2.1033(b)(7) specifies the size of the photographs necessary. May I suggest that the photographs be presented just one to a page, and in 'Landscape' orientation? Please make sure everything is clear and properly focused.
4.) FYI: The label contains an FCC logo which is only used by equipment which conforms to the Declaration of Conformity requirements of FCC. A DofC is only issued by accredited laboratories in countries which have a signed MRA with United States. If this device was tested for DofC in China, the DofC will not be legally recognized in USA. Please be certain that all DofC requirements are followed precisely. As an alternative, this device can be certified as a "Digital Device" under Part 15B. The Grant will show only one composite Part 15B/15C FCC ID, and would not show an FCC logo.
5.) I believe the Form 731 is missing a dash [-] within the FCC ID. Please correct and double check and correct all instances of all documents within this filing.
6.) Your radiated test results do a very good job of specifying antenna polarization as to vertical or horizontal. But I do not see the same diligence for device positioning. All test setup photographs show this device lying on a tabletop with the display facing up. Standard operating position should be with the display in it's normal operating position. This begs the question – was this device tested across three orthogonal planes as required by ANSI C63.4?
7.) Bluetooth transmitters typically have three different dwell time settings. Please provide dwell time data for all operational modes.
8.) Please see Rule 2.1033(b)(5). I do not find a complete block diagram associated with how the BC43B143A Bluetooth solution is integrated into this device. What we really want is a separate block diagram indication how an RF signal is created, modulated, and amplified before passing to the antenna. Please provide.
9.) Judging from the External Photographs, it appears that this device may have a "drop-in" base. (I am basing this on the multiple contacts seen adjacent to the USB connector.) Was this base available to used during testing?
10.) Please note – my understanding of ANSI C63.4 does not permit the use of a strip outlet in series with a wall mounted transformer during AC conducted testing. FCC wants to see the emissions as they enter a wall socket. Use of a strip outlet adds unacceptable attenuation and a real uncertainty to any AC conducted measurement. If you can provide justification for this testing procedure, please do so now.
11.) FYI: The Operational Description submitted was the entire BlueCore single chip Bluetooth solution specification (all 102 pages). This is not what was intended by the Rules. Rule

2.1033(b)(4) specifies “A brief description of the circuit functions of the device along with a statement describing how the device operates. This statement should contain a description of the ground system and antenna, if any, used with the device.” In the future, a more modest and shorter Exhibit applicable only to this device would be appreciated.

William H. Graff
President and Director of Engineering

mailto: whgraff@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.