



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

November 6, 2002

RE: Bitswave Inc.

FCC ID: P5G-368-397-YY-PI

After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) The block diagram should show the frequencies of all oscillators in the TX portion of the device (CFR 2.1033(a)(5)). Please provide an updated version that includes this information.
- 2) Although these both parts of the system may have been tested together, please note that the FCC requires a separate FCC ID for each part of this system. This device will require 2 separate ID numbers, one for the joystick, and one for the PS2-Plugin. The only exception to this rule is cordless phones (defined as attached to the public switched network directly). Please clarify which part of the system should be uploaded under this ID number given in this application. Unfortunately, a new submittal will be required for the other part of the system that includes updated exhibits for documents referencing the other FCC ID (such as labeling, cover letters, etc.).
- 3) The users manual exhibit is unreadable. Please provide a new exhibit for the users manual.
- 4) Please note that since labeling information and test photographs were only provided for the PS2-Plugin, only the test report for the plug-in has been reviewed at this time.
- 5) Please explain how the EUT was tested for average emissions > 1 GHz (appears to only have been tested at 1.8 GHz & 2.7 GHz for average measurements). The device states that it was transmitting in normal mode. From the theory of operation, this device sends a command sent every 16 ms (duration unknown). Please note that it is likely that reduction of the VBW will not be allowed down to 10 Hz. The VBW may only be reduced down to the point that each sweep totally captures an entire single transmission pulse. The sweep may not be reduced to the point that it captures the on-off nature of the transmitter. Note that the FCC requests that a transmitter be placed into a 100% duty cycle for purposes of the measurement when possible. Once a proper trace has been captured using a reduced VBW that still captures 1 entire transmission stated here, additional correction may be applied mathematically for the worst case duty cycle of the transmitter. Please provide detailed information as to how the average measurements were made.

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Examining Engineer

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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.