



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

December 9, 2002

RE: FCC ID: PANBT0002M1  
Attention: Vivi Wang

I have a few comments on this Application.

- 1 Please note that a module is designed to fit inside a host device while this device appears to connect to the USB port of another device. As such it would appear to be a USB dongle transmitter. Please explain how this is appropriate for a modular approval as tested.
- 2 Your documentation is not clear. In one set of documents you classify this as a module meeting all the requirements of a module. Yet in other documents you classify this as a Limited Modular Approval (see "Cover Letter - Modular Approval request\_PANBT0002M1.pdf"). Please note, LMA and modular approval are two different approvals with different requirements. Please understand that Limited Modular Approvals are devices that are tested in a particular host and are ONLY able to be used in that very specific host. They are typically "Limited" Modular Approvals because they do not meet one or more of the modular approval requirements. LMA's then cannot be used in generic type devices such as 'notebooks', etc. Use in any other host requires a PC2 or new ID. You have stated that the device is for use in PDAs Notebooks, etc. Yet have not specifically stated the exact host in a Limited Modular Approval. Should this be granted as an LMA, please understand that ONLY THE HOST TESTED will be approved for this device. However, as a modular approval the device could then fit into generic notebooks etc, depending on the power. Please correct your documentation to state the type approval being sought – i.e. Modular – not Limited Modular.
- 3 In the external photos you show three antenna types. Two are soldered antenna(s) while the other is a PCB antenna on the board. However, since an intentional radiator cannot transmit from two antenna(s) at the same time you will need to verify that the lead to the onboard antenna is cut and made inactive when one of the other antenna(s) are soldered to the antenna point. Please provide evidence that the onboard antenna is not functional when either of the other two antenna(s) is soldered onto the board.
- 4 There appears to be other I/O capabilities than the USB. What steps have you taken to insure that the USB is the worse case I/O configuration and that the other configurations do not cause the transmitter to go out of compliance?
- 5 You must show compliance for radiated spurious emissions for all three antenna(s). The data provided is not clear as to what antenna goes with what data. Please provide data showing all three proposed antenna(s) have been tested for radiated spurious emissions.
- 6 Please note that the photos of the device in the internal and external photos do not appear to be the same device as shown in the photo in the manual (see page 4 of 10 in the manual). Please explain and correct the manual to reflect the same device as in the internal photos provided and as the device tested.

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](http://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.