



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

February 24, 2004

RE: FCC ID: PANBT0310_ATCB001136

Attention: Ellis Wu

I have a few comments on this Application.

1. FYI – no action needed. Please note that Bluetooth devices are classified as Frequency Hopping devices under equipment code DSS and have a frequency range of 2402 to 2480MHz. The frequency range of 2412 to 2462 is generally DTS WLAN frequencies. I have corrected the 731 on this issue.
2. FYI – no action needed at this time. Please note that because the device under question is the Bluetooth transmitter portion of the keyboard, the block diagram should provide detailed information on the Bluetooth operation.
3. Please note that on the bottom of page 7 of the internal photos (page 4 of the pdf document) there appears to be a shield that has not been removed and there appears to be no photo of what is underneath that shield.
4. Please note that there appears to be more than sufficient room on the keyboard to place the 2 condition statement as required by Part 15.19(a)(3). Please provide evidence that this label is placed on the product as required.
5. Please note that this is a wireless keyboard that can and probably will be used in the lap. Consequently, while in the wired mode a 20 cm separation may be possible, it would not seem appropriate to use the 20cm mobile separation distance when in the wireless Bluetooth mode. Also, please note that the power of the device is sufficiently under the FCC SAR limits to warrant no SAR testing (i.e. only 2.2mW conducted and 3mw eirp). As such the device should be listed as a portable device that meets rf exposure requirements. There would then be no reason to specify a minimum 20cm separation distance. Please correct the rf exposure statement to that of a portable device meeting rf exposure compliance for the general/uncontrolled environment.
6. It appears from the setup photos that you have run the Bluetooth device from an ac power adapter instead of the batteries in the keyboard. Please explain. Also, if the card on the table in the setup photo is the Bluetooth device, please explain why it was not tested inside the keyboard.

Dennis Ward

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.