



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

September 30, 2002

RE: TeLLUS Group Corp.

FCC ID: PB6-02011

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

- 1) Please comment of if the uploaded information for ISL3873B is to be considered confidential. If so, please update the confidentiality letter.
- 2) The information uploaded for 2.1077 should include all of the following:
 - (1) Identification of the product, i.e. name and model number.
 - (2) A statement similar to that contained in Section 15.19(a)(3) that the product complies with Part 15 of the regulations.
 - (3) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.

Your compliance statement provided included items 1 & 3. However, please correct by adding item 2.

- 3) One of your recent responses provided a modular approval letter for integrators. After providing this letter, we were assuming at this point that the device was only for integrators. However your latest response stated that this device is both for the end user and integrators. Now this application appears to be addressing 2 different RF exposure configurations as shown below. Due to the RF exposure conditions and modular nature for one configuration this device would require to be certified separately under 2 different FCC ID Numbers (one for integrators, the other for end users). Please note that the product would have to be labeled differently for each configuration (the product should not contain 2 FCC ID's at the same time). For instance, the device would be labeled with a single FCC ID for integrators. The label for end users would be different and contain the other FCC ID.
 - a) Integrators, 20 cm distance classified as mobile, modular approval so the device may be installed internal to certain products by an integrator, specific manual information should address modular concerns.
 - b) End users, this RF exposure configuration is still unclear, but previous information suggested 5 (original users manual) or 15 cm (operational description) which would be portable. Due to RF exposure concerns, the FCC does not allow modular approvals for mobile classifications or configurations. It must be clear how this device will meet its RF exposure requirements for the end user configuration(s), both throughout the application and in the users manual. In this application, it is uncertain how RF exposure issues will be applied for end users. The antennas for this product are not built in, but based on their short coax length it is uncertain how an end user will use this device and how the antennas will be mounted since the users manual does not provide any of this information, nor have any "mounting brackets" or holders appear to be part of the product. Please justify the intended use for this product and how the antennas will be used and what is the expected distance from users.

Please let us know how to proceed evaluating this device given its 2 "classifications".

- 4) Please provide the RBW & VBW of the newest bandedge measurements provided and confirm if this was a radiated measurement.



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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.