



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

January 16, 2005

RE: FCC ID: PDNRM-36_ATCB002055

Attention: Asko Välimäki

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please remove the shield (part number 40528 3) from the last photo of the PCB on page 5 of the internal photo exhibit and show the circuitry underneath. Alternately, please provide adequate justification why this shield has not been removed.
2. A 12+dB loss in the cable between the signal generator and the transmit substitution antenna seems to be excessive for normal cables (i.e. these cables are usually fairly short and loss is generally around a couple dB or so). Please explain and please verify that the attenuation of the cable is as stated (i.e. length of cable etc).
3. Please note that the setup diagram shown in 5.1 is blackened out and not readable. Please provide a setup diagram that is readable.
4. The formula in section 9 of the report states $P_{\text{emission}}(\text{dBm}) = P_{\text{substTX}}(\text{dBm}) - L_{\text{cable}}(\text{dB}) + G_{\text{antenna}}(\text{dBi})$. However, the formula shown in the tables indicate that you added the cable. As you did not provide the factors themselves but only the results, it is not possible to determine if you added or subtracted that cable factor. Please correct as necessary.
5. FYI – When using formulas in calculating radiated spurious emissions, the FCC requires that a sample calculation of the formula used be provided.
6. Please note that the manual lists EU SAR limits. Please refer to US SAR limits for US products.
7. Please note that the manual states 0.63W/kg as the measured SAR. Please note that the SAR report states 0.67w/kg. Please be consistent in documentation. Please correct the manual to be in line with the SAR report.
8. Please note that the manual states 2.2cm separation distance is to maintained. Please note that the SAR report states testing was done at 1.5cm separation. Please be consistent in documentation. Please correct the manual to be in line with the SAR report.

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.