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

May 2, 2005

RE: FCC ID: PPD-D1470U_ATCB002384
Attention: Mark Briggs

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 note that the IC number on the product is not in accordance with RSP100. The number should appear as IC: 4104U-D1470U and not Canada: 4104U-D1470U. Please note that RSP100 also states "A radio equipment that is issued a TAC or a Certificate but is not properly labeled is not considered certified." This could be a problem and you should consider labeling the product as specified in RSP100.
2. Please include the name of the technical contact person on the 731 or please verify that Mark Briggs is the technical contact person.
3. The external photos show a USB cable connected to the device. However, it is not clear from the documentation if this USB cable is provided with the device. Please verify if a cable of sufficient length to provide the required 20cm separation is supplied with the device.
4. Please note that while page 2 of the manual states that the manufacturer is not responsible for unauthorized modification or unauthorized use of incorrect cables, the statement is not in compliance with 15.21 as it does not address the specific requirement of the FCC that says the manufacturer is responsible to inform the user that such unauthorized modifications may void the users authority to use the device. Please provide a manual that clearly meets the requirements of 15.21.
5. Please note that the conducted emissions plots on pages 36 to 39 of the report indicate a starting frequency of 200kHz. Tabular data has the lowest listed frequency of 180kHz. As there are a number of plots with signals at the beginning of the plotted data, please verify that the conducted emissions actually begin at 250 kHz and not 200 kHz or 180kHz.
6. Please note that on page 49 of the report the upper frequency is 5725MHz. Please also note that there is a signal at that band edge frequency that is more than 10 to 15 dB higher than the frequency where the marker is located. Please explain why the highest level signal was not selected as required.
7. Please note that in the plots on page 80 of the report you state that plot 0 had 20dB attenuation while you state that plot 1 had 30dB attenuation. As there is only a 10dB separation between the two plots the indication would be that there was not Peak Excursion taking place at this frequency. This is unlikely. Please explain and retest if needed.
8. Please note that on pages 87 through 90 you state that the measurements are antenna conducted measurements. The report then shows a red line that is apparently at -27dB. However, the amplitude is listed as dBuV/m. Please note that the limit is not -27dBuV/m but is -27dBm EIRP. Since the -27dBm limit is apparently what is being compared, it is assumed that the amplitude units should be in dBm. Please correct the plots to represent the actual measurement values and units.
9. Please note that in the item above the limit for -27dBm is EIRP and not a conducted limit. If conducted measurements are taken for the purpose of compliance to this limit, they must be corrected by the antenna gain of the system in order to provide ERIP values. As the gain of the antenna at this frequency range is 4dB, it is expected that the data in the comparison table would include this antenna gain. While the device may still be compliant, correct data showing actual measurement requirements should be provided. Please correct as necessary.

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.