



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

September 9, 2004

RE: FCC ID: PPIRH-19_ATCB001685
Attention: Thomas Reitmayer

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 document addressing the reason for the PC2 states that the rf chip has been changed but does not say in what manner the chip was changed. Please note that 2.1043 state that ANY "changes to the basic frequency determining and stabilizing circuitry (including clock or data rates), frequency multiplication stages, basic modulator circuit or maximum power or field strength ratings shall not be performed without application for and authorization of a new grant of certification." While the FCC has allowed changes in chips, the new chips are to be identical to the original chips. Changes in rf design of the chip may mean that a new certification may be in order. Please justify why the new version chip is not a change in rf circuitry requiring a new FCC ID (i.e. why is this new version rf chip identical to the old).
2. Please note that as the VCO mentioned in the reason for PC2 are frequency determining components they must meet the same criteria as the rf chip mentioned in item 1. Please provide justification why the new version VCO is not a change in circuitry requiring a new FCC ID number.
3. As the device has new versions of the rf chip and the VCO, please justify why SAR testing was determined no to be needed (i.e. are the revisions of the rf chip and VCO identical to the original?)
4. As this was a change in the rf chip, please explain why EIRP measurements were not required.

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.