



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

May 4, 2005

RE: FCC ID: PPIRM-76_ATCB002403
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 731 form indicates a part 15C intentional radiator in the application. However, no part 15C test report exists and nothing in the documentation indicates this is device contains an intentional radiator. Do you mean 15B computer peripheral instead of 15C intentional radiator for the part 15 device? Please correct the 731 as necessary.
2. Please note that the radiated spurious emissions table (page 5 Of 7) apparently lists the final value as "Level/dBm". However, your formula lists the final value as "PdBm". This means that the actual values are ambiguous as the formula used to calculate the results and the supposed actual results have no obvious correlation. Please be consistent in the naming of values and please correct as necessary.
3. Please note that the highest EIRP value in the test report is 32.2dBm in GSM mode for DUT #28750 (v5), yet the highest value measured in the SAR report is 31.3dBm 2-slot GPRS mode V5 (DUT 28759). Please note that when a difference in power levels occurs between the EMC and SAR reports, the SAR report needs to be the higher power. Please explain why the higher power GSM mode for this version was not tested.
4. Please note that the 2 slot GPRS V5 (dut 28750) has an EIRP of 30dBm in the SAR report and an ERIP of 31.3dBm. Please also note that when the power levels at the appropriate high channel is compared, the difference between the EIRP values is EMC=31.3dBm SAR=27.3dBm. This is a difference of 4dB which is to large a difference between the EMC and SAR report and which is not allowed. Please note that this occurs at other frequencies and with other models as well. Please explain this 4dB difference between the two power levels and please provide evidence that the SAR data is in fact testing the highest power levels. Please verify that the highest power was used for each channel and each version device in the SAR report.

Dennis Ward
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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.