



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

January 16, 2005

RE: FCC ID: PYARM-69_ATCB002071

Attention: Ulla Valjakka

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 provide separate test setup photos for the Part 15 Bluetooth Testing.
2. FYI – Please note that the block diagram for the BT should provide information about the BT device transmitter itself and should not simply be a single block itself.
3. Please note that the application indicates that this is also to be an IC application. Please note that no RSS100 has been provided.
4. The formula in section 9.5 of the report states $P_{\text{mission}}(\text{dBm}) = P_{\text{substTX}}(\text{dBm}) - L_{\text{cable}}(\text{dB}) + G_{\text{antenna}}(\text{dBi})$. 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. Please note that the 731 states the device is also a BT Transmitter. Please note that no test report has been provided for the BT transmitter. Please provide the appropriate BT test report.
6. Please note that the EMC report for part 15B has been provided. If this is a composite application that is to include 15B, please provide the appropriate 731 form to include this information.
7. Please provide the test reports for the conducted and radiated emissions for Part 24.
8. Please note that the manual lists EU SAR limits. Please refer to US SAR limits for US products.
9. Please note that the manual states 0.67W/kg as the measured SAR. Please note that the SAR report states 0.61W/kg. Please be consistent in documentation. Please correct the manual to be in line with the SAR report.
10. Please note that I cannot find the body worn separation distance statement in the manual. Please explain and please provide as necessary.
11. Please note that according to the response to the above comments, more comments may be forthcoming.

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.