



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

June 4, 2003

RE: FCC ID: PZWBHT8000
Attention: Keijiro Kumagai

I have a few comments on this Application.

1. Please note that this is a portable device. However, the manual contains the 20cm separation statement for mobile devices. Since the device is less than 5mW, your rf caution statement should only state that, "This device meets the FCC RF exposure Guidelines in OET65."
2. Please note that a handheld device cannot be considered a professionally installed device. While the antenna may be installed in the device by the manufacturer, this does not mean 'professionally installed' as intended in 15.203. A professionally installed antenna would be an external antenna installed on site by a professional installer. This device appears to have an integral antenna not accessible to the end user. It appears that possibly the small white block in the upper right hand side of the "Solder Side" photo on page 2 of the file "Internal Photo _BHT Assy.pdf" may be the antenna. Please clarify and correct your report appropriately.
3. Please provide photos of the antenna and antenna port connector and how the antenna is situated (positioned) in the device.
4. Please provide information on how the "sub board" and "main board" fit together in the device.
5. Your report lists several models and provides some information on these models but does not explain if there are any electrical or mechanical differences between them. Please explain any electrical or mechanical differences between the differing models.
6. Please note that while the radiated emissions table in your report shows compliance to the restricted band emissions, the antenna conducted emissions data table is not correct. Antenna terminal conducted emissions in accordance to 15.247(c) only needs to show that emissions are 20dB below the fundamental by using either conducted or radiated data. The tables show a column listing <74dB as a limit. (74dB is only relevant to the allowed peak compared to the average limit of 54dBuV in 15.209 for radiated spurious emissions in the restricted bands. It has no relevance otherwise). The tables on page 26 of the report therefore are not correct. Please show antenna terminal conducted emissions in relation to the <20dB as specified in 15.247(c). Also, please explain what the columns "Difference of dB level" and "Field strength" in these two tables are.

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.