



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

October 1, 2003

RE: FCC ID: Q3N-8360BL_ATCB000806

Attention: Ellis Wu

I have a few comments on this Application.

1. Please note that since you are using 15.249 as the part to certify the device under, you must use the pulse width duty cycle factor as specified in 15.35. The pulse width duty cycle must be measured over the 100ms pulse train as specified in 15.35 using the worse case transmission (most data) and is not based on dwell time per channel. This may mean that you may have to stop the hopping and measure the 100ms pulse train of the maximum modulation possible. Please provide the plots and or data that show the pulse width duty cycle factor as specified in 15.35(c) and correct the report as necessary for this measurement. x
2. Please note that since this is not a 15.247 device but a 15.249 device, testing must be in accordance with 15.249. Consequently the band edge compliance must be done in full hopping mode only, not with the hopping stopped. The entire transmission pattern of the device must then be fully within the allotted frequency band. Please provide plots showing band edge compliance with the device in full hopping mode. This would also have to comply in all of the modes (data, inquiry etc). x
3. Please note that 2.1033 states that block diagrams must contain all clocks and their paths. The block diagrams provided do not meet this requirement. Please provide block diagrams in compliance with 2.1033. x
4. Please explain how it was determined that the RF Terminal with 39 keys was worse case as mentioned on page 5 of the report. x
5. Please note that on page 3 of the manual you state that the device was tested to Class A digital device. On page 16 you state that it was tested to Class B digital device. Please be consistent in the manual. x
6. Please note that since this is being certified to 15.249 the rf and collocation statements are not needed nor appropriate for the manual. Please remove the statement from the manual if this is to be certified to 15.249. x
7. Please note that the device appears to be more than sufficiently large to contain the 2-conditions statement as required by 15.19. Please provide a sample of this 15.19 label that will be on the device. Alternately, please provide sufficient justification as to why this device meets the exemption rule in 15.19(a)(5) – please note that size does not appear to be a problem. x

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.