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

July 2, 2007

RE: FCC ID: Q5EPT520001_ATCB005117
Attention: peter

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 is signed by Ms Cheryl Zhu. However, no indication as to who this person is has been provided and the applicant name listed on the 731 is chenxin. Please explain the relationship between Ms Cheryl Zhu and the applicant company. Please provide evidence that Ms Zhu has the authority to sign documents for the applicant.
2. Please note that while the manual states the device is not to be worn on the body, the external photos show what clearly appears to be a belt clip or belt clip holder. Please explain.
3. Please note that page 4 of the FCC test report states Power Out was tested in accordance with 90.205(h) and (g). Please note that 90.205(h) is for the 450–470 range and 90.205(g) is for the 421-430MHz range. Please explain why this section was used for a 150-174MHz device. Please retest using the proper rule part section.
4. Please note that page 18 of the test report indicates that masks B and D were used, but the table on page 4 only shows mask B. Please explain.
5. Please note that FCC listing in accordance with 2.948 do not apply to licensed devices. Please also not that no indication in the accreditation statement indicates that the lab has part 90 on it scope of accreditation. Consequently, no evidence is provided that the lab is qualified to perform testing in accordance with part 90 of the FCC rules. Please provide evidence that the lab has FCC Part 90 in its scope of accreditation from CNAL. Alternately, please show evidence that ATCB has audited the lab and has approved the lab for part 90 testing.
6. Please explain the term "Not available for this EUT" on page 7 of the FCC report. Does this mean accessories are not provided for this model or does it mean they were not accessible for test?
7. Please note that the report does not state testing was performed in accordance with TIA603C. Please confirm and verify that all testing was performed to the FCC acceptable test method TIA603C.
8. Please note that the audio modulation plots on pages 11 through 16 of the FCC test report do not look like what is normally expected in such a plots. Please explain the plots and please confirm that the modulation circuitry in the unit is operating properly.
9. Please note that the formula stated on page 24 of the FCC test report (i.e. Transmit Power(dBm)=Reading(SG)(dBm)+Antenna Gain(dBm)-Cable Loss(dB)) does not match the results provided in table 9. For example you state that -41.4dB + (-3.1dB) – (+5.2dB) equals -39.5dBm. Please note that the results using the formula provided should be -49.91. Please recalculate all values in table 9 of the FCC report and please provide a sample formula using one of the data sets in the table.
10. Please provide a more detailed explanation of the "Wired Cloning Mode" function of the device. What is the intent of the cloning mode etc.
11. Please note that the manual is for both the European version and the US version. Please confirm that the US version cannot be made to operate on non-US frequencies.

Dennis Ward

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.