



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

April 19, 2007

RE: FCC ID: Q7V-3F090009X_ATCB004767

Attention: Tom Marks

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 as this is a modular approval, the installation manual for the module is the only manual needed and/or recommended. Please note that the manuals provided are not the installation or operating manuals for the module alone but are for the host device the module goes into. It would be more appropriate for this application if the module installation manual consisting of only sections 8 and 9 of the manual be provided. Inclusion of extraneous information about specific usage may tend to confuse the full modular approval of this device.
2. Please note that section 2 of the manuals state that the module may in fact be placed in a host collocated with another module. Are the two modules antenna(s) within 20cm of each other? If this is the case, how has collocation been addressed? If this is not the case, please clearly state that the modules are not collocated and the antennae are at least 20cm from each other in the scenario described.
3. Please note that while section 4.2.5 states the device was "tested by itself", the test setup photos do not support this statement. From the test setup photos it appears that the module was tested in the host and not standalone. Please note that full modular approval requires testing in standalone configuration. The setup indicates testing for LMA applications and not full modular applications. The stand alone configuration is especially critical in the application as the reported radiated spurious emissions margin is only 0.05dB (see pages 12-26 of the test report). Thus compliance of this device as would be represented in a fully standalone configuration required in DA001407 is in question. Please explain and please provide data for a fully stand alone configuration (i.e. the module placed on an extender cable or board separate from the host board).
4. Please note that the report (page 6) calls this a Digital Transmission System however, testing appears to be for DSS (Frequency Hopping Spread Spectrum). Please note that the manual and other documentation refer to this as a Frequency Hopping Spread Spectrum Device. Please explain and please be consistent in the device description throughout the documentation. Please correct the report to properly describe the device as FHSS.
5. Please note that the operational description describes this device as a max power of 250Mw. Please note that this is not supported by the test report. The test report also suggests that should the device be set to any power greater than 185.35mW (i.e. 22.68dBm) the device would not be compliant (please see radiated emissions data for restricted bands where compliance is less than 0.005dB). Please correct all documentation to define the output power of this device to be more representative of the actual output power measured. Please note that inline with item 3 and the questionable compliance, please explain how the absolute maximum output power of this device will not exceed that measured and thus not cause the radiated spurious emissions to exceed the limit. Alternately, please provide test data for a device set to a maximum output power of 250mW.
- 6.

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.