



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

September 5, 2007

RE: Airo Wireless Media, Inc.

FCC ID: QDLA25TVVJ

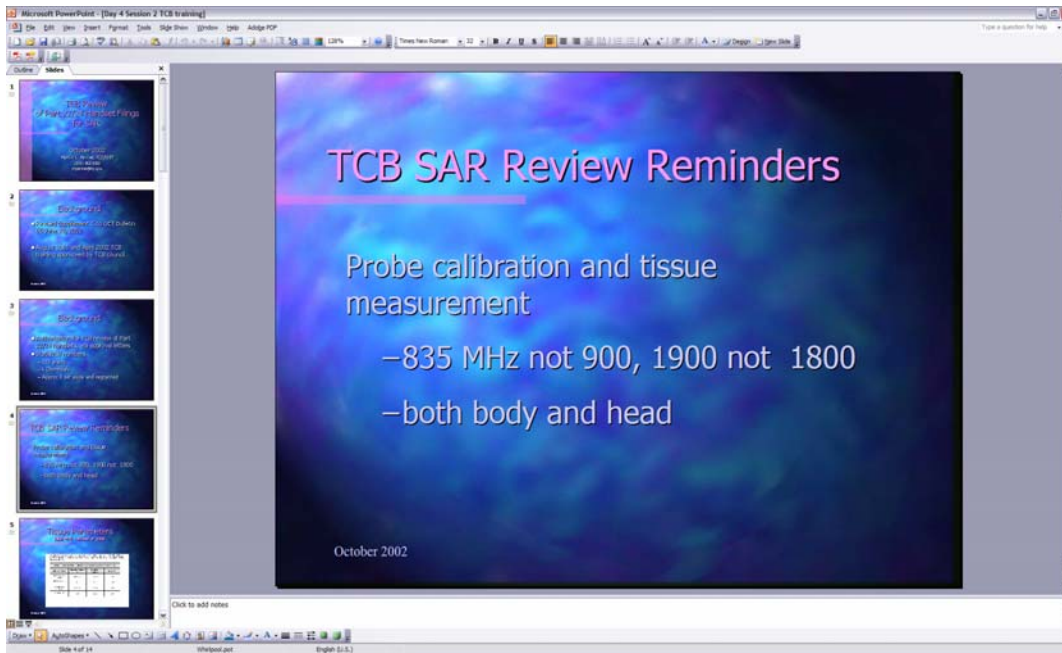
After a review of the submitted information, I have a few comments on the above referenced Application. Depending on your responses, kindly understand there may be additional comments.

It seems some confusing information uploaded 9/3 that contradicts information provided on 8/24

- 1) For the 731 form, given the test data it appears power should be listed as follows...For 850: 1.16 W ERP, 1900: 0.714 W EIRP, 2.4 GHz: 0.00237 W conducted. Please confirm and if you agree please update the 731 form.
- 2) Given the data, the frequency tolerance should be listed as 24 Hz for 850 MHz, 17 Hz for 1900 MHz on the 731 form. If you agree, please update.
- 3) ERP and EIRP power should be measured for Edge mode. GSM and Edge are each listed on the Grant separately and the power is required to be ERP (Part 22) and EIRP (Part 24). Please provide.
- 4) Page 13 of the part 22/24 report mentions peak power from some measurements and average for others. Normally peak power is provided. Please explain. Additionally, it is uncertain what the difference is between tables 1 and 3.....2 and 4 on this page. Maybe this is Edge vs. GPRS? Please explain.
- 5) Device still appears to contain an external antenna connector (see page 1) intended for use by the end user. Does the manufacture plan to supply antennas/accessories for use with this port? Currently the device is not covered for use with these external antennas. Note that generally the FCC wants additional line items or grant notes for portable for use with vehicle mount antennas with appropriate ERP and EIRP tests. Please explain.
- 6) SAR information/response from previous comments has currently not been received. Original comments are shown below for convenience.

SAR:

- 17) Please note that although the FCC accepts verifications done within 100 MHz of the center frequency, they have issued information during training that they want 835 MHz calibration done – not 900 MHz. Please correct this in the future.
- 18) SAR Report cites ¼ crest factor for GPRS on page 5. However information found in the manual cites the GPRS is class 12 compliant which would be a ½ crest factor – which appears to possibly be correct on data plots. Please review/correct.
- 19) Tissue dielectric parameters and probe factors must be measured at mid band frequencies (i.e. 835 MHz). See below....It is also uncertain if the probe factors of +/- 50 MHz or +/- 100 MHz apply under the calibration certificate given the note given.



- 20) Please explain if this device can send data while voice mode is active. If so, then GPRS mode would be required to be tested at the head level as well.
- 21) Please explain compliance to worse case mode for Edge compliance as well. While edge is lower power, the crest factor is doubled as well. Maybe measurements of the worse case position should have been repeated for Edge mode?
- 22) Permittivity and conductivity of Dipole validation is expected to be within 5% of the values used during the original dipole calibration. Some values exceed this.
- 23) SAR report appears to be missing:
 - a) Descriptions of coarse area scan procedures, including grid size, area shape and size
 - b) Descriptions of interpolation procedures used to locate peak SARs at a finer spatial resolution
 - c) Descriptions of high-resolution cube volume or "zoom" scan procedures used for local scan; list measurement and interpolation resolutions
 - d) Descriptions of extrapolation procedures used to estimate SAR values adjacent to phantom surface (unreachable due to probe case and boundary effects)
 - e) Descriptions of within-cube interpolation procedures to get 1 mm or 2 mm SAR grid
 - f) Description of averaging (integration) procedures to get 1-g SAR from final interpolated grid
 - g) Report does not defined if the device is a production unit or identical prototype.
 - h) Describes the positioning procedures used to evaluate the highest exposure expected under normal operating configurations
 - i) Z-axis plots are required for worse case results.
 - j) A tabulated list of the error components and uncertainty values contributing to the total measurement uncertainty (Suppl C App. D)
 - k) Reporting the combined standard uncertainty and expanded uncertainty (for $k=2$) of each test – 30% or less expected
- 24) Without Z-axis or other information, the following could not be determined:
 - a) Distance between the measurement point (distance + offset) at the probe sensor location (geometric center behind the probe tip) and the phantom surface is < 8.0 mm and maintained at a constant distance of +/- 1.0 mm during an area scan to determine peak SAR locations
 - b) When Probe boundary effect compensation is not used the probe tip should be positioned at least half a probe tip diameter from the phantom surface during area and zoom scans.

- c) The first 2 measurements points in a zoom scan, closest to the phantom surface, should be within 1 cm of the surface.

A handwritten signature in black ink, appearing to read 'Timothy R. Johnson', with a stylized flourish at the end.

Timothy R. Johnson
Examining Engineer

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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.