



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

September 2, 2003

RE: FCC ID: QMNRH-27

Attention: Mary Washington / Klaus Kettunen

I have a few comments on this Application.

1. Please note that you have included the CDMA guard band frequencies (824.7 and 824.31 MHz) in the frequency of operation. Please note that the guard bands are not listed on the grant as these are not used in normal CDMA. Please correct the 731 to show the actual allocated and accepted frequencies listed by the FCC for CDMA and AMPS cell phones.
2. Please note that IEEE 1528 recommends a max power drift of 5%. If this number is exceeded, it also recommends that an explanation be provided to justify the excessive drift. Please note that the plots of SAR data taken show a drift in excess of 5% (approx 8%). Please provide an explanation for this excessive drift as required by the FCC and IEEE 1528.
3. Please note that the CDMA plot of the 849MHz band edge (page 46 of 67 on the EMC report) shows that the trace is over the limit. This may be due to the jagged nature of the trace. Also, it is not easy to determine if the band edge on page 47 of 67 is compliant. Again, this may be due to the jagged nature of the trace. Please verify compliance and/or provide compliant data plots of band edge readings.
4. Please note that while Modulation Characteristics are not specifically listed as required in Part 22, they are required by 2.1047. There does not appear to be data for these tests (AMPS). Please explain and/or provide the required data.

A handwritten signature in black ink that reads "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.