



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

April 22, 2003

RE: FCC ID: QMNRH-3DNG

Attention: Mary Washington

I have a few comments on this Application.

1. Please note that only the location page of the FCC ID information exhibit was provided. Please provide an actual example or photo of the actual label to be used.
2. Please verify the operational frequencies for the Part 22 Cell bands. Please note that the report states the device operates from 824.7 to 848.3 while the FCC designated bands are 824.73 to 838.19.
3. The data states -13.45dBm at 824 and -13.85dBm at 849. This suggests only -0.45 and -0.85dBm under the limit at the 824 and 849MHz band edges. However, since this is very close to the limit and a span of 5 mHz may be insufficient to provide an accurate enough reading to justify compliance to band edge requirements. Please note that at 5MHz a frequency error of less than .01% would appear to cause the device to be non compliant. A span of 1Mhz or less may be a more appropriate span. Please confirm (or provide a better resolution plot) that the band edges are compliant.
4. Please note that the power listed on the grant is conducted. However, power for part 22 is ERP and power for part 24 is EIRP on the grant. This is 0.439 and 0.341 respectively. Please correct the 731 to show the proper power levels as required by the appropriate parts.
5. Please note that the difference between the max conducted power in the EMC report and that of the SAR report is 7%. This is greater than the allowable 5%. Please provide SAR power levels within 5% of the EMC levels. (see page 5 of the SAR report and page 11 of the EMC plots.) Please note that the 23.5 level shown on page 10 of the EMC report is a level used for spurious emissions and is not accurate enough for conducted power use. If this is the power level you are using to show SAR and EMC within 5% please provide a plot of actual conducted power using appropriate analyzer settings that clearly show 23.5dBm as an accurate measurement.
6. Please verify the Part 22 transmit frequencies listed on page 6 of the SAR report. Please note that the listed frequencies do not agree with the FCC published frequency chart for CDMA devices under Part 22. Please correct as necessary.
7. There are a number of plots that 'cut off' the graphical representation of SAR. Please verify that no hot spots exist outside the area shown in the plots provided. Please explain how you made this determination.

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.