



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

June 2, 2006

RE: Compal Communications, Inc

FCC ID: QQQXUPX001

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Kindly provide separate block diagram Exhibits for both the Bluetooth and WLAN portions of this device.
- 2.) Please review the Internal Photos. Are pages 3&4 duplicates?
- 3.) Kindly provide separate photos for the WLAN and Bluetooth devices. As an alternative, please indicate where the BT and WLAN devices are located in the existing Internal Photographs.
- 4.) What accounts for the differences in SAR values between the models T830 and T810? Why are they so different? What is meant by the term "serial model"? If necessary kindly indicate the construction differences in the Internal Photographs. Are there any changes to antenna gain for any of these transmitters between the two models?
- 5.) Kindly note the SAR report has photos which are requested to be held in confidence under Short Term Confidentiality rules. FCC will permit SAR test setup photos to be moved to the Test Setup photograph section of the Application. The SAR report by itself cannot be kept Confidential.
- 6.) Kindly explain how this device will not be able to utilize WiFi channels 12 and 13 in North America.
- 7.) Please provide for me some guidance in locating the Bluetooth device in the Schematics.
- 8.) Kindly explain in a specific, separate attestation letter how and under what circumstances different radio sections will transmit under simultaneous conditions.
- 9.) A Part 15B report was included with this filing. Will DoFC or Certification apply to this device as an Unintentional Radiator?
- 10.) I am unable to be assured of compliance with the radiated 15.205 Restricted Band edge at 2483.5 MHz. All 802.11b/g modes need to be tested across all data rates. I suggest a set of radiated plots of no more than 60 MHz span, and centered directly on 2483.5MHz, with both peak [1MHz RBW / 1MHz VBW] and average [1MHz RBW / 10Hz VBW] measurements would be helpful. These plots should be taken as radiated measurement on a 3M OATS, and not a conducted measurement at the antenna terminals. FYI: According to my estimates, a device with about +17dBm output on a 0dBi gain antenna should have a radiated field strength in excess of +110dBuV. This means that to show compliance with the limits, I should expect to see emissions offset from the fundamental at 2483.5MHz down over 54dBc. This is not able to be demonstrated with the data presented.
- 11.) Please identify the plot page 20 of the GSM test report. I am unable to correlate the RF power displayed to anything. What are you trying to demonstrate?
- 12.) Your GSM Test Report temperature data shows that the device did not turn on at any temperatures between -20C and -30C. Is this by design or are we looking at a fault with the specific sample tested? Please provide a letter from applicant attesting that this device will not operate at colder temperatures by design.
- 13.) The tune-up procedure states that a tolerance of +/- 2dB is allowed for RF power. FCC requires that all devices for both SAR and EMC test be tuned to the upper range of this allowance. For this case, this would translate to possibly a ~40% increase in RF power and reported SAR. Please review.

- 14.) Is the manufacturers supplied holster necessary to meet SAR requirements? Is the spring clip for this holster made of metal?
- 15.) The contact person on Form 731 does not match the FCC database. Please confirm the contact information at FCC database and update as necessary.
- 16.) Kindly provide an Agent Authorization letter allowing Sporton International to act as agent for Compal Communications.



William H. Graff
President and Director of Engineering

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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.