



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

December 22, 2005

RE: Lipman Electronic Engineering Ltd.

FCC ID: R5Y-EZWFM04

After a review of the submitted information for FCC, I have a few comments on the above referenced Application.

- 1) This device was originally approved as a mobile device (> 20 cm between operator not including the hand or wrist and closest part of antenna element) but in this specific configuration, it is uncertain as to if this may be considered portable. It is also uncertain how the specific antenna/device will meet this requirement for the additional configuration being submitted. Please provide information (photographs, etc.) which support the 20 cm spacing requirement as a mobile device.
- 2) In addition, it is uncertain if this device will transmit while body worn as well, or only if while held in the hand. Please provide further information to support how it will only transmit while in the hand. For instance, is there any provisions for body worn accessories offered with the device (body straps, harnesses, cases, etc.)? What keeps the TX from transmitting while on the body? For instance most network devices maintain communication with the network even when not actively transmitting data.
- 3) Please provide a separate MPE exhibit (if mobile applies) or appropriate SAR exhibit (if portable applies) for this configuration. Additionally, please provide calculations for this device instead of actual measurements.
- 4) The device appears to be a hand-held configuration. Was the device investigated/tested in all 3 axis as stipulated by ANSI C63.4? Note that it is not necessary to provide all 3 axis of data, but only report worse case.
- 5) FYI...Because this antenna/configuration was not tested in the open, please note that this approval will only be limited to the specific configuration tested.
- 6) FYI....This approval is still going to support the TX module only, but for a specific configuration. Additional approval of the entire device (i.e. digital device emissions, DoC, etc.) is not the subject of this approval and must still be applied where applicable.
- 7) FYI...Because the application still only applies to the modular approval, full review of certain documents (i.e. manual) may not be performed. Therefore block diagrams, schematics, etc. are not being reviewed.

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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.