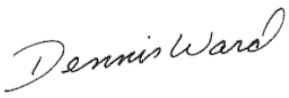
American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

January 7, 2009

RE: FCC ID: RAD093_ATCB007171
Attention:

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that while a block diagram is not required for licensed devices; when one is provided it should follow 2.1033 requirements. Please note that 2.1033 states that block diagrams should contain information on the clocks involved in the device. Please note that the block diagram provided does not appear to contain any information on the clocks used in the device. Please correct.
2. Under section 8.2 page 13 of the SAR report you appear to be using an incorrect dipole target value in your system verification data table as the listed values do not agree with the calibration values from the dipole calibration. Please also check the 1900MHz data as well and mearure/re-measure the 850MHz and 1900MHz as needed using the proper dipole factors.
3. Please note that page 9 of the manual lists a USB icon as available on the phone; however, the data in the application does not support a USB port on the device. Please verify that this device does not contain a USB capable port.
4. Please explain why a European Standard (EN300 910 V8.5.1) is referenced on pages 18 and 19 of the part 22-24 report. Please note this reference is not correct as it deals with the EU bands and not the US bands bands of operation. Please correct and make proper references to standards and methods used.
5. Please note that you must show compliance to the erp/eirp radiated spurious emissions using the antenna substitution method. While a precalibrated field may be used, you must still show how the final results were obtained. Please note your report section B2.3 on page 22 of the report states, “The spurious emissions were done with different settings, using the relevant pre-amplifiers for the relevant frequency ranges. This is the reason that the graphs show different noise levels.” Please note that this is not acceptable. Please show erp/eirp compliance by including ALL relevant data including the factors associated with any pre-amplifiers and any associated path loss. Please provide the formula and the relevant data used for at least the 6 highest readings within 20dB of the limit even if noise floor (please refer to the plot on page 30 of the report in which levels less than 2dB under the limit exist). Please show the appropriate values as stated in section B.2.1 of the report in the data.
6. Please note that all you show in the ERP/EIRP tables is the final results. This is not acceptable. Please show the actual EUT measurement values and correction factors used to determine the final results (i.e. show the value of EUT measurement and the value of the reference path loss associated with the measurement.



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. Except as described in §0.459, correspondence and responses 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.