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

November 6, 2003

RE: X-micro Technology Corp.

FCC ID: RAFXBT-DG1G

I have a few comments on the above referenced Application.

1) The FRN Number provided (0009222233) appears not to be valid from checking on the FCC website. Please provide a correct FRN number for X-Micro Technology Corp. Note that a grant can not be issued without this.
2) Certain characters of the FCC ID on the label are not easily readable. Please provide a higher resolution label that is clear.
3) The 20 cm distance given in the users manual (page 2 of 62) is not applicable to this type of device. Touch conditions can occur. However due to the EIRP of this device, it is not necessary to cite a distance in the users manual. Please remove this sentence from the users manual.
4) The users manual (page 61 of 62) states that this device is a Class 1 Bluetooth device. Note that a Class 1 device is 100 mW (20 dBm). Additionally, the test report states the device is a Class 2. Please explain.
5) FYI. The RF exposure exhibit mentions 2.5 cm distance. This distance is not necessarily correct for the type of device since touch conditions can occur. However, due to the power output and gain of the antenna, an RF exposure exhibit is not necessary. Therefore the exhibit provided will be ignored.
6) Because of the narrow band nature of the signal, normally the delta from peak to average measurements for a frequency hopping system is only a few dB. This is due to the fact that frequency hopping systems must be measured using a hop-stopped carrier (frequency stopped, plus non pulsing carrier) when possible. Frequency hopping systems are measured hop stopped for PEAK and AVG emissions using the non-pulsing frequency stopped signal, and if they TX < 100 msec per channel during normal end user operation they may be additionally corrected for the worse case time of occupancy per channel. If the device was not appropriately hop stopped during average measurements, then the use of the AVG detector using standard RBW = 1 MHz and VBW = 10 Hz will not be allowed. If necessary, please provide plots of the fundamental as it was set during testing using RBW = 1 MHz and VBW = 10 kHz, 1 kHz, 100 Hz, 10 Hz settings, using a zero Hz span and 20 - 30 msec sweep time. Alternatively, you may remove the actual average measurements and replace them by the following:

   Apply the correction factor for the worse case expected duty cycle using DH5 packet information (see dwell time within attachment provided) to the peak measurements to obtain an average value without actually needing to test the Average emissions.

7) Note that the concern given in 6) will also affect the results shown for the bandedge test.

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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.