



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

May 30, 2006

RE: FCC ID: RFK-CHA819_ATCB003517

Attention: Leon Paul Kass

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 provide internal photos that show both sides of all boards.
2. Please provide a separate tune up procedure. If tune up is not done on this device, please provide a statement to that affect.
3. Please note that the PCS band has F1D, GXW, DXW, F9W emissions designators while the Cell band has F1D, GXW, DXW emissions designator. Please confirm that F9W is not included in the 824MHz band.
4. Please note that the test report RV48085A-004 is dated Feb 2006. It appears to be a revision of a report dated as far back as Jan 2004. Please note that the FCC does not accept data for reports more than one year old. Please state the relevance of any data in the report that is more than one year old.
5. Please note that the test report RV48085A-004 is dated Feb 2006. Please note that the list of calibrated equipment show calibration due date prior to Feb 2006. Please also note that both TIA603 and ANSI C63.4 state that measurements are to be done using equipment with current calibration. This means that all of the equipment used in the Feb 2006 report is out of calibration. Please provide a report using currently calibrated equipment as required by the accepted FCC test methods.
6. Please note that the resolution bandwidth for measuring power of the CDMA signal in the PCS band was set to 10kHz. Please note that the FCC has stated that no measurements of licensed devices for BW or power can be made with a res bandwidth of less than 1% of the emissions bandwidth. Please note that a CDMA emissions bandwidth is typically 1M25 (or 1250kHz). This would mean that the minimum res bandwidth allowed for measurement purposes would be 12.5kHz. Please provide channel power measurements under a condition where the res band width is not less than 1% of the emission bandwidth. Alternately, as these type analyzers are supposed to determine a proper 1% bandwidth, please explain how the analyzer determines the auto res bw function and why the res bandwidth is not 1% or more of the measured emission bandwidth as is supposed to be.
7. Please note that the FCC has stated that for Occupied Bandwidth measurements the resolution bandwidth shall not be less than 1% of the emission bandwidth. Please note that the emission bandwidth for the CDMA signals in the report is stated to be 1.26MHz. This would be a res bw of 12.6kHz or GREATER. Please provide occupied bandwidth measurement data using the acceptable FCC guidelines of 1% or greater res bw.
8. Please note that in the procedure for unwanted emissions the report states that it subtracts the gain on the antenna. Please note that the gain of the antenna is to be added to that of the signal generator output not subtracted. Also please note that the results table does not provide any information for the antenna gain or cable loss. Please explain and please correct as necessary.
9. Please note that part 22 spurious emissions is an ERP limit while part 24 spurious emissions is an EIRP limit. Please note that the test results do not clearly identify if the results are ERP or EIRP. Please correct the report to show the proper units.
10. Please note that spurious emissions for all bands is necessary. This means that both the uplink and downlink bands for both part 22 and part 24 must be provided. The report only appears to show spurious emissions data for the uplink 824MHz band and the uplink 1850MHz band. Please provide the missing downlink bands for part 22 and part 24.

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.