

February 3, 2004

RE: FCC ID: RFK-LMSWDJH819 Attention: Leon Paul Kass I have a few comments on this Application.

- 1. Please provide a completed 731. This form is required by ATCB quality to allow tracking of applications etc. Please indicate on the 731 which frequency ranges are for which rule part. If all frequency ranges are for all rule parts, please so indicate. Please remove the tolerances in the power field and please put the maximum measured conducted power.
- 2. Please indicate the appropriate equipment code for the device on the 731 form (item 4a on the 731).
- 3. Please note that except in extenuating circumstances internal photos are not allowed to be held confidential. Please remove the internal photos from the confidentiality request.
- 4. Please note that the request for confidentiality is not the proper place for the technical specifications of a device. Please remove the technical specs shown on the request for confidentiality and restrict the request for confidentiality to listing those items that are to be confidential.
- 5. Please provide the external photos for this device showing the device from the various sides of the exterior.
- 6. Please provide the factory tune up procedure for this device. This tune up procedure should indicate how the automatic power adjustment is set.
- 7. Please provide a manual that contains the appropriate rf exposure statements for this mobile device (i.e. the 20 cm or appropriate separation distance statement).
- 8. Please provide an MPE report for this device as required by the FCC rules.
- Please note that the list of test equipment shows that the testing was apparently done using out of cal equipment (i.e. analyzer due cal 1/10/04 and testing done 1/20/04). Please explain and retest as appropriate using properly calibrated test equipment.
- 10. Please note that as this application is for parts 22 cellular, 24 PCS and 90 frequency bands, it is unlikely that this device will be used strictly in F3E modulation. Please note that amplifiers must be shown to be able to reproduce all emissions types that are to be used. Please provide evidence that this device will comply using all of the appropriate modulation types. Alternately, please show how this device restricts use to F3E modulation types only.
- 11. Amplifiers are to faithfully reproduce the input. This means that each modulation type is to be input to the device and a plot of both input and output is to be provided. The report shows what appears to be an unmodulated input signal. Please provide evidence of testing all modulation types (i.e. provide input and output plots of all modulation types used).
- 12. Please note that it is unclear from your report if you used the antenna substitution method specified in TIA 603. Your reference to 2.2.1.1 is for conducted carrier output power, not radiated spurious emissions as stated in the report. The limits listed in the report are also 54. However, you have not specified 54 what? It is assumed this is 54dBuV. This, however, would not be correct as the limit for ERP/EIRP measurements of spurious emissions of licensed devices is -13dBm (94dBuv). The report data indicates that only field strength emissions levels were measured. Please explain, and or retest using the proper antenna substitution method specified in 2.2.12 of the latest edition of TIA 603.
- 13. Please note that the report on page 39 states that this device is used in the part 22E paging bands. Please note that this device frequency range lies in the part 22H cellular bands and is not in the allocated part 22E frequency bands. Please explain and/or please test to the correct frequency bands for device operation as stated in the application.
- 14. Please provide a test report that addresses all of the rule parts to which this application applies.
- 15. Please note that your report references 90.219g. Please note that there is no such section in 90.219. Please use current CFR rule parts when referencing CFR 47. Please provide a report specifically referencing all appropriate rules parts for which this application applies.

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Dennis Ward

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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.