



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

May 10, 2004

RE: EC-EYE Communication and Technology, Inc.

FCC ID: RZPPMX7000

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

Administrative/General:

- 1) The block diagram should show the frequencies of all oscillators in the TX device (CFR 2.1033(a)(5)), unless this portion of the device is an OEM part. Please provide either the block diagram for the TX portion, or alternatively provide a parts list that shows that this part is provided by another manufacturer by listing the OEM manufacturer. Note that a block diagram is necessary for both transmitters.
- 2) The current block diagram makes mention of 802.11b and does not mention anything about Bluetooth. Please provide further detail regarding this issue. Note that inclusion of any 802.11b may require a separate FCC ID for the device.
- 3) It does not appear that internal photographs were provided underneath all subshields on the device. Please provide.
- 4) The operational description does not mention anything regarding the Bluetooth portion of the device. Please update. Additionally, it is uncertain if the Bluetooth and Part 24 may operate simultaneously. However, currently it is assumed that simultaneous TX may occur.
- 5) A schematic of the Bluetooth or GSM portion does not appear to be provided. Please provide, or alternatively if these are manufactured by a different manufacturer the parts list may be updated to show the OEM manufacturer.
- 6) The Tune Up procedure does not appear to contain any power target values. Please update.
- 7) Since this device may be considered as a PC Peripheral, then a compliance information sheet should be included in the manual on the same page as the FCC statements (alternatively, this may be shipped with the product as a separate sheet). Please provide. This information should contain the following information regarding DoC compliance:

FYI:

COMPLIANCE INFORMATION FOR DoC AUTHORIZATIONS (47CFR 2.1077)

If a product is tested and authorized under a Declaration of Conformity, a compliance information statement shall be supplied with the product at the time of marketing or importation, containing the following information on a single page:

- (1) Identification of the product, i.e. name and model number.
- (2) A statement similar to that contained in Section 15.19(a)(3) that the product complies with Part 15 of the regulations.
- (3) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.

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- 8) Description of all circuitry and devices provided for determining and stabilizing frequency, for suppression of spurious radiation, for limiting modulation, and for limiting power.
- 9) The users manual warns against using at less than 20 cm as well as evaluation for SAR. These statements contradict themselves. Please correct.
- 10) It appears that simultaneous TX EMC results many not have been provided. If the device transmits simultaneously for Bluetooth and GSM, this will be required.
- 11) It appears that SAR may not have been evaluated for simultaneous TX either. If the device is capable of this, then it should be evaluated for all expected worse case conditions. See attachment.
- 12) The part 24 Test report explains the power as 30 dBm +/- 2 dBm. Note the FCC expects worse case to be tested, however the test report shows only a 28.3 dBm conducted. Note the tune-up procedure and operational description do not provide this information. It appears the device may not been functioning at maximum power for the test. Please retest/correct all exhibits affected as necessary.
- 13) For Part 25 antenna conducted tests, it appears a power divider was used. It is expected that the measurement results are corrected for associated cable and power divider. Please explain if this occurred.
- 14) There appears to be a spurious emission just above the fundamental that was not measured. Please explain and/or measure as necessary.
- 15) It is uncertain if only 1 battery type will be provided for the device by the manufacturer. Note that each type of battery must be tested. Please explain.
- 16) It is uncertain if any body worn accessories are being provided. If so, do they contain metal? What spacing from the body do they place the EUT. Note all accessories with Metal should be tested.
- 17) It is uncertain what levels of GSM/GPRS are contained in this device. Currently the crest factor for both body and head is listed only as 8.3. Please explain.
- 18) The SAR test report should state the FCC ID of the device being tested.
- 19) Please explain if the device uses bands for use outside of the U.S., or if it only contains bands as given in this application.
- 20) Please define the actual distance used for body SAR. Photographs tend to suggest that maybe a spacing of 1.6-1.7 mm was used. This distance will be cited on the grant.
- 21) Please justify the use of 8.3 vs. 8.0 Crest factor.
- 22) The entire hot spots should be captured. Certain head plots appear to show areas that may be clipped (Entire hot spot is not shown). This may require remeasurement if adequate explanation can not be given.
- 23) Dipole calibration appears to be provided for 835 MHz as well. Please explain.
- 24) FYI.....Section 5.7.4 of the part 15 test report shows the limit at 2.39998 GHz as 54 dBuV/m. Note the limit from 2.39-2.4 GHz is only -20 dBm as the restricted band falls at < 2.39 GHz.



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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.