




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

September 25, 2007

RE: ATCB005443

FCC ID: S2ZTRC2400 for Signal Technologies Corporation

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

1. There are several problems with the original and Permissive change grants on the licensed modular transmitter being incorporated into this device. In order to not hold up this product, I am going to request an RF safety evaluation of the combined device. The MPE exhibit provided in this filing is not sufficient. Section 2.1091(c) of the FCC Rules states "Mobile devices that operate in the Cellular Radiotelephone Service, the Personal Communications Services,... are subject to routine environmental evaluation for RF exposure prior to equipment authorization or use if they operate at frequencies of 1.5 GHz or below and their effective radiated power (ERP) is 1.5 watts or more, or if they operate at frequencies above 1.5 GHz and their ERP is 3 watts or more." The ERP for the licensed module being incorporated into this device exceeds these limits. For example, the GSM 850 MHz device (1.7 Watts ERP) exceeds 1.5 Watts ERP limit below 1.5 GHz and the GSM 1900 MHz device (3.06 Watts ERP) exceeds the 3.0 Watts ERP limit above 1.5 GHz therefore routine evaluation appears to be needed for the licensed module. Please provide either routine evaluation or additional evidence of a duty factor that can be applied to this device to show compliance with the RF safety limits in the FCC Rules. This class of GSM device may have a built-in duty factor that can be applied to reduce the overall ERP.  Section 2.1091(d)(2) of the Rules or Supplement C to OET Bulletin 65 for further guidance.

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Examining Engineer

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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.