



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

August 24, 2004

RE: SkyBitz Incorporated

FCC ID: SAE-000MTXB

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

- 1) Internal photographs can not simply be held confidential. Further justification must be provided before confidentiality can be granted on this exhibit. Additionally, if only certain pages of this exhibit are to be held confidential, then the exhibit must be separated into 2 parts, one not held confidential, and one that is.
- 2) For the RF exposure, the device does not require MPE testing and is therefore excluded from this "evaluation" per the FCC rules, not the RF exposure requirements or calculations. Therefore, it is still required that you provide MPE calculations. Please add this information to the current RF exposure exhibit.
- 3) Users Manual section 4.0 and the test report page 3 of 26 mentions an EIRP of < 2 Watts, while 700 mW + 5.5 dBi given in the MPE evaluation is 2.5 Watts. Please explain (this may be affected in part by #7 below).
- 4) Please explain the derivation of the 700 mW, since this never appears to have been measured.
- 5) Is direct antenna conducted measurements possible. If so, the FCC likes also to see the conducted output power measurements on this type of device. Also, other antenna conducted measurements should be provided for spurious if the capability exists.
- 6) Section 5.0 discusses the installation as normally located > 20 cm, etc. Note that the users manual must specifically instruct how this must be installed and/or used to meet the RF exposure requirements. This type of device should state the following or similar.

The antenna(s) used for this transmitter must be installed to provide a separation distance of at least 20 cm from all persons and must not be co-located or operating in conjunction with any other antenna or transmitter. This device must transmit with a source-based time-averaging duty factor not exceeding __% (This part may or may not be applicable).

- 7) Correction factors are for power and are typically corrected based upon $10(\log)(RBW1/RBW2)$. Please correct data that is affected throughout the report (RF Exposure, power measured, etc.) that may be affected. Note this will likely affect item 3 above.
- 8) For this type of TX, section III, Items 6(c) and (d) must be filled out on the 731 and match information presented in the application. Please adjust 6(b) for any final EIRP in Watts, due to item 7) above.
- 9) For Occupied BW - The SA "Reference Level" should be equal to the total power from the transmitter as if you measured it with a power meter and not the maximum emission of the spectrum. Ideally, your bandwidth measurement is relative to the total (or unmodulated power when possible) unless stated in the rules. Additionally, when not specified in the regulations, the occupied bandwidth should be measured at 26 dB down for the FCC (See ANSI C63.4). Therefore your 26dBc points would be down from the reference level - not the peak of your emission.
- 10) The mean power of spurious emissions shall be attenuated below the mean output power of the transmitter in accordance with 25.202(f). This means the reference level for Figure 2, 3 should be positioned as given in 9) above. Additionally, the measurements should be made using a 4 kHz RBW or larger based upon the requirements. Please comment or correct as necessary.

- 11) Please explain where compliance to 25.216(i) may be found.
- 12) Please explain the DC voltages and currents applied into the several elements of the final radio frequency amplifying device for normal operation over the power range



Timothy R. Johnson
Examining Engineer

[mailto: tjohnson@AmericanTCB.com](mailto:tjohnson@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.