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

February 23, 2005

RE: Innovative Wireless Technologies, Inc.

FCC ID: SP8-IWTBB1142 or SP8-WTBB1142

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

1) The FCC ID shown on the 731 for and label are different. Which are correct? Note that all cover letters, 731 and documents appear to support one FCC ID. Also, 2 different FCC ID's are shown in the labeling exhibit. Please correct all documents as necessary.

Response: The correct FCC ID is shown on the 731 form – SP8-IWTBB1142. A revised label exhibit has been uploaded.

2) Please provide the list of tunable frequencies associated with this device.

Response: The list of tunable frequencies has been uploaded with this response.

3) Please explain the use of a 400 kHz high pass filter for AC power line conducted measurements when measurements are made down to 150 kHz.

Response: This was a typographical error in the test report. Please see the revised test report uploaded with this response.

4) Radiated spurious emissions appear to be taken with 100 kHz RBW. FCC methods require a 1 MHz RBW.

Response: Please see the revised test report uploaded with this response with emissions remeasured at 1MHz RBW.

5) Is this device being approved as a DTS of DSS device? 731 form states DSS, but test report supports DTS.

Response: The device is being submitted as a DTS device. Please see the revised test report and 731 form uploaded with this response.

6) 6 dB bandwidth methods specify a 30 kHz RBW. FCC methods require a RBW of >=100 kHz.

Response: Please see the revised report uploaded with this response for the correct plots.

7) Section 8.1 mentions average power, while the data appears as peak. Please clarify. Note that average power measurements requires a 30 dB attenuation of all non-restricted band signals instead of 20 dB.

Response: The only use of the word "average" in section 8.1 is in the description of the power sensor: "E9323A Peak and Average Power Sensor". Data presented in section 8.3 is peak power.

8) It is suggested that the users manual should be further updated for additional FCC issues. Some issues appear to already be covered. Please consider updating the user manual to include any missing information shown on the next page.

Response: Please see the revised user manual uploaded with this response.

The manual should provide further information and better detail as to how the OEM must use the module in order to maintain RF exposure. In order to make sure that the integrators are given enough information, please add the following information or similar to the users manual:

This device is intended only for OEM integrators under the following conditions:

1) The transmitter module may not be co-located with any other transmitter or antenna.
2) The Module is approved using the FCC 'unlicensed modular transmitter approval' method. Therefore the module must only be used with the originally approved antenna(s).

As long as the 2 conditions above are met, further transmitter testing will not be required. However, the OEM integrator is still responsible for testing their end-product for any additional compliance requirements required with this module installed (for example, digital device emissions, PC peripheral requirements, etc.).

IMPORTANT NOTE: In the event that these conditions can not be met (for example certain, collocation with another transmitter, or a different antenna), then the FCC authorization is no longer considered valid and the FCC ID can not be used on the final product. In these circumstances, the OEM integrator will be responsible for re-evaluating the end product (including the transmitter) and obtaining a separate FCC authorization.

End Product Labeling
The final end product must be labeled in a visible area with the following: "Contains TX FCC ID: {INSERT FCC ID HERE}".

RF Exposure Statements That Must be Included in the Users Manual
The users manual for end users must include the following information in a prominent location "IMPORTANT NOTE: To comply with FCC RF exposure compliance requirements, the antenna used for this transmitter must not be co-located or operating in conjunction with any other antenna or transmitter."

Additional Information That Must be Provided to OEM Integrators
The end user should NOT be provided any instructions on how to remove or install the device.

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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.