



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

October 17, 2005

RE: FCC ID: TA8AKRC11822-1
Attention: Keith Goshia

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that the list of exhibits, the report exhibit list (pages 5 and 6 of the report) and the actual exhibit numbers themselves do not agree. Please correlate the list of exhibits with the actual exhibit numbers. (FYI – this is more for clarification and consistency).
2. Please note that the technical description appears to be for a 1900MHz and 2100MHz system but does not address the 850MHz system. Please also note that the technical description refers to FCC Part 24, but this device is a Part 22 (see page 33 of the pdf document). Please provide a technical description that addresses the system in the application.
3. Please note that 2.1033(c)(13) states, "For equipment employing digital modulation techniques, a detailed description of the modulation system to be used, including the response characteristics (frequency, phase and amplitude) of any filters provided, and a description of the modulating wavetrain, shall be submitted for the maximum rated conditions under which the equipment will be operated." Please note that the technical description appears to address the system wide description but does not provide much on the actual transmitter description. A short technical description of the transmitter digital modulation system should be included.
4. Please note that there does not appear to be external photos for the radio unit. Please provide separate external photos or drawings of the device.
5. Please note that 22.901(d) as been removed from the CFR. The report references this deleted rule section on page 8. Please correct.
6. Please note that 22.917 went through a major revision that changed the out of band emissions requirements. Part 22 devices now only have to meet a required $43+10\text{Log}(P)$ requirements similarly as part 24. The report, on page 18, refers to sections that have been removed. Please correct.
7. Please note that on page 41 of the report the data does not clearly indicate how antenna substitution was used in determining compliance to the radiated spurious emissions requirements. Please confirm that the antenna substitution method for radiated emissions found in TIA603 was used. Please provide a sample of how the data was obtained (i.e. provide the sample formula used in the test to determine the ERP of the emissions) and please provide a short description of the antenna substitution test method used.
8. FYI – please note that clear designation of the band edges on the plots on pages 12 and 17 would help band edge compliance determination.
9. Please note that 22.917(b) stipulates that the lowest resolution bandwidth that is to be used for occupied band width and band edge measurements is 1% of the bandwidth. Please note that the resolution band width used in the data plots on pages 1 through 17 of the report was 30kHz. Please note that the bandwidth of the data appears to be greater than 3.5 MHz. This would mean that the lowest resolution bandwidth that should be used would be. Please justify the 30kHz resolution bandwidth in relation to the occupied bandwidth of the emission (i.e. was a wider resolution bandwidth used that showed the data in the report is accurate and acceptable?).

Dennis Ward

Dennis Ward

<mailto:dward@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.