



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

August 24, 2005

RE: Estech Systems, Inc.

FCC ID: TJ6PR0345

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

- 1.) FYI: My apologies on the length of time it took to get these comments back to you. But there were a couple of issues that did arise which need to be addressed.
- 2.) Testing for this 125 KHz device appears to have been done in a 10M semi-anechoic chamber. I can find very little public information to show how a chamber will react at these very long wavelengths. This is not to say the data was taken incorrectly, but there is very little I can find to indicate how any chamber will or should react at these frequencies. This does call into question not only the fundamental but all spurious emission measurements below 30MHz. In addition, this also could potentially affect the published uncertainty budget. I am loathe to ever requiring any unnecessary testing from any laboratory, but for this case I need some assurance that the measurements are performed properly. Kindly provide some additional correlative data showing that these measurements are still valid, especially since 3M measurements were extrapolated to 300M. I will accept either retesting on an OATS or manufacturer's data on typical chamber performance.
- 3.) The Manual is identified as "confidential" on the face page. Please bear in mind that a Manual is rarely ever allowed to be a confidential document. In addition, this seems to be only a portion of the Manual with much information missing. One of the most important issues is being certain that the end user does not have any access to any controls which will permit operation in unauthorized frequency bands. Kindly provide a more complete Manual.
- 4.) The label for this device should display the 15.19(a)(3) statement on the device. In addition, the "FCC Logo" only applies to devices which seek Equipment Authorization using the Declaration of Conformity process. See 15.19(b) as well as Part 2 of the Rules for further information.

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President and Director of Engineering

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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.