



# American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

June 10, 2006

RE: FCC ID: TPO-OTD300-0

Attention: Stuart Nicol

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 manual states that the use of this device is on the wrist or ankle. The manual does not appear to indicate any use worn on the body other than these locations. Please note that SAR testing was apparently done for body worn configurations as well as locations on areas such as ankles and wrists. As this device is not used in a body worn configuration other than wrist and feet/ankles, please explain the relevance of body SAR testing to this application (i.e. are there configurations not listed in the manual where the device can be worn on the body in other than wrist, hands feet? If so, please define these positions and please include some information in the manual.
2. Please note that the manual states a max SAR for ankle worn configuration is 4W/kg. Please note that the report states the max SAR for this configuration was only .693W/kg. Please explain the inconsistency and please correct as necessary.
3. Please note that TCBs cannot evaluate SAR for configurations using wrist, hands or feet (ankles). Please explain the relevance of this data in the TCB application.
4. Please note that part 24 is an EIRP measurement. Please note that the report (page 16) states that the limit for portable part 24 devices is 30dBm EIRP. This is not correct. Please note that the correct limit for part 24E is 2 watts EIRP or 33dBm. Please compare results to the proper limits when determining compliance margins.
5. Please note that page 16 of the report states that part 22H is an EIRP limit. Please note that this is not correct. Please note that part 22H is an ERP limit. Please use the correct and proper limits when comparing values for compliance. Please correct the report to show correct limits for part 22 and part 24.
6. Please note that page 10 the report states that "The output from the cable connecting the dipole was re-connected to an RF power meter. The effective radiated power (ERP) was read directly from the power meter." Please note that this is not the ERP or EIRP as it does not include the gain of the dipole antenna. Please provide a sample formula used to determine ERP/EIRP values showing the proper addition of the substitution antenna and please correct the report as necessary to include this antenna gain value.
7. Please note that the power listed in the SAR report does not specify what kind of power is being listed. Is this conducted power or ERP/EIRP power. Please also note that conducted power must be within 0.5dB of that listed in the EMC report and within 3dB of the EMC report if ERP/EIRP is being used. Please provide information on which type power is being used for both part 22 and part 24 data.
8. Please note that the radiated spurious emissions data is not correct. Please note that ERP/EIRP is not the equivalent power into the dipole but is the power delivered to the dipole + the gain of the Dipole. Please correct the radiated spurious emissions to properly reflect actual ERP or EIRP (as appropriate) values for the associated rule parts (i.e. ERP for part 22 and EIRP for part 24).
9. Please note that page 23 of the report states that the 'power into the dipole' for the frequency 3819.6MHz is -13.63dBm. Please note that as mentioned in items 5 through 8, ERP and EIRP must include the value of the dipole gain. Please note that while part 22 values may be 0dB as the dipole gain compared to a dipole is 0, the EIRP of a dipole is approximately 2.16dBi. Please note that as this factor was not included in the value in the table mentioned above and because part 24 devices are EIRP and not ERP, the frequency listed appears to fail spurious emissions limits (-13.63dBm + 2.16dBi = -11.47. Please retest as necessary and resubmit corrected data showing compliance to the proper limits.

10. Please explain what relevance FCC ID: IHDT56dB1 has with this application (e.g. a statement to the fact that the data provided is still representative of the product being certified and that the product has not been modified in any way that may affect the results of the test data being used.



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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.