



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

July 1, 2007

RE: FCCID VCPKB52U
Attention: Cherry Li

During the review of this device, the following items need to be clarified. Please be aware that there may be additional questions based upon the responses to these items.

1. The location of the part 15 compliance information is preferred to be in the User Guide. It is suggested that for future products you consider this rather than having the information printed on the packaging.
2. The label information, while showing the location of the label on the device, does not address other labeling requirements, especially how the label is affixed to the device. Please clarify this requirement per 2.1033(b)(7) and 15.19(b)(4).
3. The bandedge information supplied is sufficient to show compliance to 15.247(d). However, 15.205(a) is not addressed. Please show compliance to 15.205(a).
4. This device appears to be capable of USB connection to a PC and is therefore also considered a PC peripheral device (in addition to the TX requirements, i.e. Part 15.247) and is subject to either a Certification or DoC as a PC peripheral. Therefore the application must clarify if you are asking for:
 - a. Certification of the device as a TX, and a DoC has been performed by an appropriately accredited test lab for a PC peripheral.
 - b. Certification as a TX+PC peripheral

Note 1: The option b would be considered as a composite application and 2 certificates (one for the TX, one for the PC peripheral portion) would be issued. Note that there are additional review costs associated with this additional certification

Note 2: To qualify to perform DoC applications, the test lab must be accredited (i.e. NVLAP or A2LA) to perform testing under the DoC procedure.

Note 3: Note that for DoC tests, the device is configured with a minimum test configuration as specified by ANSI C63.4 which includes complete computer +2 I/O devices attached (one may be the EUT) during this particular test.

Note 4: Each path (DoC or Certification) has particular labeling requirements that must be followed. For DoC authorizations, the label should also include specific DoC labeling information and also the User Manual should include information regarding Part 2.1077. If the device is Certified, the FCC ID and current labeling requirements for the TX will cover the labeling requirements. However, additional grants are generated and review costs are higher.

The manufacturer does have a choice of DoC or Certification, however the device labeling and manual information must match the appropriate method used.

Best Regards,

Michael Mobley
<mailto:mmobley@atcb.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 the 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.