



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

July 24, 2007

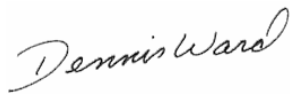
RE: FCC ID: VFIBW89119806_ATCB005204
Attention: Stephen Guo

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 devices under 15.247 are typically equipment code DTS or DSS. The equipment code you have listed on the 731 (DXX) is improper. Please correct the equipment code to reflect the true nature of the device.
2. Please note that 15.247 is limited to Digital Transmission Systems, Frequency Hopping Spread Spectrum Systems or hybrid systems. Please note that while the test report suggests the device is a frequency hopping spread spectrum device, the operational description does not appear to fit either a DTS (Digital Transmission System), a DSS (frequency hopping system) nor a hybrid system. For example that operational description states "Otherwise, there are 4 synchronous channels (distributed in the 75 channels uniformly)." Please note that synchronous use of channels is not allowed in a frequency hopping pseudo random sequencing. This indicates non pseudo random hopping. If this is a FHSS device it must meet the pseudo random hopping requirements of 15.247. Please provide this pseudo random frequency hopping list and please explain the statement "4 synchronous channels". Otherwise, please verify the operation of this device and request certification under an applicable part 15 rules.
3. Please note that the test report states there are 74 channels but the operational description states there are 74 channels. Please provide documentation that reflects the same device and which reflects the same operational parameters. Please correct the documentation to be consistent.
4. Please note that the conducted emissions data plot on pages 11 and 12 of the FCC report blocks out the header information for the plots. Please provide this information (i.e. res bw vi bw etc).
5. Please note that part 15 of the FCC rules requires testing to C63.4 2003. Please note that the report references C63.4 2001 (see page 20 of the report). Please correct and/or retest using the proper ANSI C63.4 test methods.
6. Please note that the radiated test data on pages 20 through 26, while a formula is mentioned, only provide the final results. Please note that 2.1033 specifically states "The report shall include sample calculations showing how the measurement results were converted for comparison with the technical requirements." While the formula was provided, no sample calculations were provided. Please provide the required data in the report as per 2.1033(a)(6) (i.e. the antenna factors, cable factors and preamplifier factors).
7. Please note that DA00705 (FHSS test method) requires that the plot of the 20dB bandwidth is to be submitted with the report. Please provide these plots per the accepted test method.
8. Please note that DA00705 (FHSS test method) requires that the band edge plots be submitted. Please provide these plots per the accepted test method.
9. Please note that DA00705 requires that the plot of the frequency separation be provided with the report. Please provide these plots.
10. Please note that for the dwell time you state two different number of hopping channels. Earlier in the report the device is said to be only 74 channels. Please explain and in light of the supposed 4 synchronous channel usage, please verify dwell time if this is a FHSS device.
11. FYI - Please note that the DoC label can only be used for computers or computer peripheral devices and devices listed under 15/101. Please note that this device appears to connect only to a Play Station. Please note that a Play Station, while it in itself may be a computer peripheral, is not classified as a computer. Thus devices plugged into the Play Station do not have the DoC label unless they themselves are a computer peripheral device. Please explain why the DoC label is on the device and please correct as necessary to be in line with 15.101.

12. Please note that RSS210 is not an appropriate Canadian standard. Please note that as of June 2007 RSS210 Issue 7 must be used. Please correct and/or retest the device to the appropriate RSS210 issue 7.

13.



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.