

American TCB

September 10, 2007

RE: FCC ID: UXMWAY5000 (VLNWAY5000)

Attention: Tim Johnson

Please find our responses to your second set of comments on this application below:

1) Response to previous comment 4 & 5 was not provided as expected. Note that this is asking for the Fundamental measured ERP (Part 22) and EIRP (Part 24) using substitution methods and EIA/TIA 603 as required under FCC rules. Please provide.

We provided the antenna conducted data for comparison with the SAR test report but neglected to provide the field strength substitution data. The report now includes this data. Note: revised form 731 documents have been uploaded to match the ERP and EIRP values.

2) FYI...Response to item 8 suggests a Verification was done for the PC peripheral (i.e. Class A). However note that the new labeling provided appears to show DoC labeling. Additionally please note that the manual page 23 & 24 cites class B. The labeling must be consistent with intended approvals. If the device is verified than DoC labeling should be removed. Regardless we will assume that either a DoC or Verification is appropriate and therefore a Certification on the PC peripheral is not needed.

Noted, This is not a personal computer peripheral. It is for use with transaction terminals. It is therefore subject to verification and can be a class B device. The actual label does not have the FCC logo. However, we note that the label document has a FCC logo on the item indicating the location of the label but not in the label graphics.

3) Voltage vs. frequency data was still not provided. Note that this test is identical to the frequency vs. temperature only you adjust the voltage and measure the frequency error. Please provide for Part 22/24. See 2.1055(d) for details and also EIA/TIA 603.

The data is found in Run 3 of the aforementioned pages. We adjusted voltage and the EUT shut off at the battery end point so the frequency error is 0.

4) Manual should still caution under "approved accessories" the user that Body-worn operations are restricted to belt-clips, holsters or similar accessories that have no metallic component in the assembly.

A revised manual version 1.5 has been uploaded with this additional caution.

5) Output power for 1900 MHz does not appear to be changed on the cover or in all tables of the SAR report. Additionally the response appears to suggest a 1 dB difference, but the results appear to show only 0.1 dB applied. Note that the FCC expects the sample used for SAR to have power  $\geq$  the EMC report. Maximum EMC power for 1900 MHz band was 29.5 dBm. Please review.

The 29.5 dBm in the original EMC report was a typographical error. The measurement was 28.7dBm. The plots taken show 28.7dBm. Therefore, the EMC and SAR powers do match.

Regards,

A handwritten signature in blue ink that reads "David Guidotti". The signature is written in a cursive style and is positioned above the printed name and title.

David Guidotti  
Senior Documentation Specialist