



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

July 7, 2003

RE: FCC ID: AK8PEGACC5\_ATCB000557  
Attention: Yuykari Ito

I have a few comments on this Application.

1. Please provide a 731 form. -
2. Please remove the shield form the small circuit portion shown on the first internal photo and show what is underneath. -
3. Please note that the device appears more than sufficiently large to contain the 2-condition statement on the device as required by 15.19. Please provide a sample label with this statement on the device. Alternately, please explain why this device meets the exception of 15.19(a)(5). Please note that size would not appear to be a valid exclusion. -
4. Please note that the OBW plots on page 15 are not correct. The OBW is the 26dB points, not the -10dB points. It appears that the OBW was incorrectly taken at the -10 to -15dB points and not at the correct -26dB points as specified in C64.4 13.1.7 (Occupied bandwidth measurements). Please note that the proper dB down for the OBW is calculated at the 1% (99% power point) where .05% exists on each of the two side bands. This relates to  $20 \log(0.05)$  or -26dB. Please show compliance of the OBW requirements using your -26dB plots. This requires correcting your OBW table and removing your incorrect OBW plots and using your 26dB plot data. Please use the required section 13.1.7 and Annex I of ANSI C63.4 as your measurement guideline for OBW. -
5. Please specify the modulation used in the OBW test. Please follow the modulation guidelines of 13.1.1.1. -
6. Please note that on page 20 of your report the QP is higher than the peak reading. This is not possible. Please explain. -
7. Please note that on page 20 of your report you show several bandedge data that is higher than the fundamental. This is not allowed. Under no circumstance can any emission be higher than the fundamental. Please retest your device showing compliance to this requirement. -
8. Please note that your modification statement in the manual is not appropriate nor correct. Your statement infers that the warranty would be void if unauthorized modifications are made. Please note that this is not what the FCC regulations say the statement is to state. The statement must inform the user that unauthorized modifications may void the users authority to operate the equipment, not that any warranty will be voided. Please correct the statement to be in line with the requirements of 15.21 of the FCC rules. -
- 9.

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.