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

March 11, 2003

RE: FCC ID: AK8PEGAWL110_ATCB000278
Attention: Keijiro Kumagai / Hiroka Umeyama

I have a few comments on this Application.

1. The Form Factor has not been clearly identified. IT appears to be PCMCIA. Please disclose the correct form factor for this device.
2. Even though the device was tested stand alone using a laptop, the device appears to be primarily for PDA use. This then brings the question as to the applicability of the EMC as well as the SAR testing performed. The manufacturer states the intent of this device is for use in a PDA. As well. Consequently, while there are PCMCIA 'adapters' commonly available and while the device may be purchased and used in this adapter, since the intent of this device is for PDA also, this is how the SAR should also have been tested in test setup measurements 1, 2 and 3. Please explain why a PDA configuration was not used.
3. Your manual reports only Body SAR. It appears that this device can and will find its way into PDAs that may have or will have cell phone type uses. This means that they will be used next to the head. What steps have you taken to test the product in this obvious use situation? Alternately, since this device will be sold to stores that market the device for use with and in the adapters listed in item 1 and since this device as sold, can also be used in potential PDA situations as stated in this item, please explain how the manufacturer can make this device unusable in the PDA cell phone configuration (i.e. how can the manufacturer limit this device for use solely in Sony and other manufacturer PDAs not having only PCMCIA slot and not having cell phone capabilities?).
4. If this device can be used with a PDA that has cell phone capabilities and can transmit simultaneously with that transmitter, it may fall under the TCB exclusion list II(e) which states that "devices containing multiple transmitters that transmit simultaneously, when *routine SAR evaluation* is required for the highest output (dominant) transmitter, and any of the other (non-dominant) transmitters is operating at higher than 5 mW " Please explain this possibility.
5. Normally, modules are used in specific configurations. This then means that the OEM must install the module. However, the manual clearly indicates that this device is meant to plug in and out of the PDA or notebook using the PCMCIA adapter by the end user. This is typically against the intent of the FCC classification of a module. PCMCIA type devices are not strictly classified as "modular" devices. This appears to be of the PCMCIA type classification (i.e. plugs into a 'PCMCIA" external type card slot. How does the manufacturer prevent incorrect use of this device in the PDA? (I.e. does the manufacturer only sell this to OEM and require OEM installation? If so, how does he control OEM use or resale in a 'plug and play' PDA/Cell phone or CFA form factor to PCMCIA adapter configuration).
6. Again, the SAR report states Notebook computer use, yet the manual specifically states PDA use. (While the SAR report correctly identified the Notebook use, the manufacturer incorrectly only identifies sole PDA use.) Please clarify.

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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.