



September 28, 2006

RE: FCC ID: K7SF8V7101-1_ATCB004071

Attention: Peter Lin

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 provide a more in depth explanation of the antenna system and operating parameters of this device.
2. The test report states that the "F8M025 and F8V7101-1 are identical in schematic, structure and critical components except for screen and connector, which vary with different customer. Therefore, testing was performed with F8V7101-1 only." Please note however, that differences do exist between the two devices. Please explain what steps were taken to determine that the F8V701-1 was in fact the worse case device?
3. Please note that the lab must insure and verify the maximum tuning range of the device. This is to be done by manual tuning of the device over the full and maximum extent. Please provide evidence in the report that this was done and that the device does not tune outside the allowed frequency range.
4. Please note that all intentional radiator fundamental emissions must be greater than any spurious emission. Please note that 15.209(c) states, "The level of any unwanted emissions from an intentional radiator operating under these general provisions shall not exceed the level of the fundamental emission. For intentional radiators which operate under the provisions of other sections within this part and which are required to reduce their unwanted emissions to the limits specified in this table, the limits in this table are based on the frequency of the unwanted emission and not the fundamental frequency. However, the level of any unwanted emissions shall not exceed the level of the fundamental frequency." Please note that the table 7 on page 13 of the report shows what appears to be a fundamental peak reading at 98.052MHz of 33.5dBuV/m. Please also note that at 140.02MHz on the same table and in the same polarity the QP level is 34.5dBuV/m. Please also note the same situation on page 14 of the test report where 107.9MHz has a peak reading of 30.2dBuV/m and 140.02 has a QP reading of 34.7dBuV/m and 30.6MHz has a QP reading of 32.4dBuV/m in the same polarity as the fundamental. Please note that as a QP reading will always be either the same or less than a peak reading when these readings are compared the device is shown to be non-compliant to 15.209(c). This device is not certifiable based on this finding. Please redesign and/or retest this device to be in compliance with ALL appropriate rule sections.
5. As this device is not certifiable as presented, an additional full and complete review of all documentation may be needed upon resubmitting compliant data from a compliant device.

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.