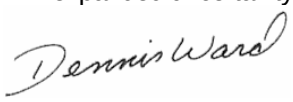
American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

March 16, 2005

RE: FCC ID: PPIRM-94_ATCB002213
Attention: Thomas Reitmayer

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 the block diagram for part 15 devices must contain 'the frequency of all oscillators in the device". The block diagram provided does not contain this information. Please provide the clock and oscillator information required by 47CFR 2.1033.
2. Please note that section 6 of the BT report refers to ANSI C63.4 1992. Please note that this is not the current accepted revision of ANSI C63.4. The current accepted version of ANSI C63.4 is the 2003 version. Please also note that there are a number of significant changes between the two revisions. Please verify and confirm that testing performed in accordance with C63.4 meets the requirements of the current accepted document.
3. Please note that the dwell information reported on page 11 of the BT report does not correlate with known Bluetooth dwell times for DH5 mode. Generally dwell times for BT devices run in the neighborhood of 100+ms, 200+ms and 300+ms, depending on the mode. DH5 generally has s dwell time of approximately 233ms. Please verify the mode the device operating in when tested (i.e. DH1, DH3 DH5)? Please provide data consistent with expected BT dwell times.
4. Please note that the formula on page 5 of the part 24 report does not agree with the data table (i.e. the value Urx is not provided). Please provide this missing data.
5. Please note that the EIRP or conducted power of the EUT is to be measured just prior to the SAR test and just after the SAR test. Please note that the values given for EIRP in both the EMC report and the SAR report are identical. It is not expected that this would occur as the test data would be taken at two separate times and most likely by two separate sets of test equipment. Please explain.
6. Please note that as this is also a part 15C device and is smaller than the palm of the hand the verbatim statement, "This device complies with part 15 of the FCC Rules. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation" MUST be either on the device or in the manual. The statement currently in the manual is the part 15 statement for receivers. Please provide a manual with the required Part 15.19(a)(3) statement.
7. Please note that the uncertainty listed in the calibration data for probe serial number 1395 is +/- 9.7% while the uncertainty for probe calibration listed in the provided uncertainty budget is +/-5.8%. The expanded uncertainty in the provided uncertainty table in the SAR report is 29.8%. Please verify that the difference between the probe calibration uncertainty in the cal certificate and that listed in the uncertainty table in the SAR report is not sufficient to exceed the max 30% allowed expanded uncertainty.



Dennis Ward
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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.