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

June 11, 2004

RE: IKUSI – Angel Iglesias

FCC ID: PVTTR800-US

After a review of the submitted information, I have a few comments on the above referenced Application.

Administrative Issues:

1) It appears that a modular request is being made for this application. Please note that the FCC requires that a modular request letter be provided that addresses each point from the public notice (i.e., each requirement listed and a description of how the device complies with each).
2) For Part 15 devices, a list of the actual operating frequencies should be included. Additionally, the lowest and highest operational frequencies should be reported on the 731 form. Please correct.
3) The test report lists this as a code DSR, which is reserved for devices falling under 15.231. This device should be listed as a DXT. Please correct.
4) The schematic only provides reference designators and does not provide values. Please provide a schematic that includes the values.
5) Information mentions the device was tested for Part 15 Verification requirements. However the manual appears to be missing the information required by 15.105.
6) FYI….An RF exposure exhibit is not necessary for 15.249. This exhibit has not been evaluated.

Technical Issues:

7) AC powerline conducted method mentions the use of a high pass filter. Please explain how this was taken into consideration for measurements from 150 kHz to 400 kHz.
8) Please explain why the device appears different in the conducted photographs from the radiated photographs.
9) Duty cycle calculations may only be based upon a worse case period of time as 100 msec. Please correct all aspects of the test report affected (harmonics, etc.). The correction factor should be (20 log .249) = 12.1 dB.
10) Review of Table 5.2 – 5.8. For 15.249, average measurements may only be used for > 1 GHz. Measurements of the fundamental may be in peak or QP values only. 114 dBuV/m does not apply at the fundamental frequency and applying an average duty cycle calculation is not allowed at the fundamental, but may be used for measurements > 1 GHz. Note that a QP detector may be used, however the repetition rate must be in excess of 20 Hz. The duty cycle present does not meet this requirement either. From the information shown, this device does not meet the limits. Note that changes to the fundamental will also require remeasurement of harmonics.
11) For average measurements above 1 GHz, note using a reduced VBW should not be used since the emissions are pulsed. Average results should be obtained by correcting the peak measurement by the appropriate duty cycle. Please correct.

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Examining Engineer

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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.