

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

August 2, 2005

RE: FCC ID: PY7BE001011_ATCB002648

Attention: Kathy Grzovic

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 for cell and PCS phones the FCC wants the center frequency of the highest and lowest channels for each type service listed on the grant. Please note that the 731 provided only lists the band and not the actual frequencies for each type service. In the case of this device these frequencies would be 824.04 – 848.97MHz for AMSP and 824.7 – 848.31MHz for CDMA and 1851.25 – 1908.75MHz for PCS CDMA. Please correct the 731 to show the proper frequencies.

Response: Please refer to the revised test report and revised 731 form uploaded with this response.

2. Please note that while it appears that this application is also for IC, no IC application form has been provided. Please provide an application form for Industry Canada.

Response: Please refer to the RSP-100 form uploaded with this response.

3. FYI – no action needed. Please note that this appears to be a modular device. Because of the power ratings of licensed devices and because of the licensed service use, modules are not generally approved for licensed services. Strictly speaking “modular approvals” are part 15 only. However, this device will be approved as a transmitter for mobile only use.

Response: Noted, thank you.

4. Please provide a separate tune up procedure. If there are no user tunable capabilities, please so state.

Response: Per the manufacturer, there are no user tunable capabilities.

5. Please note that the manual states that this device is not to operate with an antenna gain greater than 1dBi. Please note that the AMPS power is listed as 3.02W (34.8dBm). Using a 1dBi antenna the separation distance from the device in a mobile configuration must be 23cm. Please provide the MPE report to support an accurate separation distance and please correct the manual to be in line with actual MPE values for Mobile Only configurations. Please include PCS band operation also.

Response: Please refer to the RF Exposure exhibit uploaded with this response, as well as the revised manual.

6. Please note that the report does not appear to contain the required band edge compliance data. Please provide plots/data showing band edge compliance.

Response: Please excuse the oversight, and refer to the revised report uploaded with this response.

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7. Please provide a cross reference table showing the appropriate sections in the RSS standard used for IC certification in relation to the data in the test report.

Response: The test report has been updated to show the IC standard references.

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.