



American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

September 2, 2003

RE: FCC ID: PYASU1B

Attention: Ellis Wu

I have a few comments on this Application.

1. Please note that the non-modification statement in the manual is not in accordance with the requirements of Part 15. Part 15.21 states that the user is to be informed that unauthorized modifications may VOID his right to operate the equipment, not simply that it may violate FCC rules. Please provide a non-modification statement in the manual that meets the intent of 15.21.
2. Since the device is too small to contain the 2 condition statement, this statement must be in the manual. Please provide this statement in the manual as required by 15.19.
3. Please note that the information to the user as required by 15.105 does not appear to be in the manual. Since this statement is to be on "a Class B digital device or peripheral", please provide a manual containing this statement.
4. Since this is a part 15.247 device, an rf exposure statement is needed. This may be a simple statement that it complies with the FCC rf exposure requirements. Please provide a manual with a proper rf exposure statement.
5. FYI - Please note that QP and average limits MUST be met for conducted emissions. Please note that when using either peak or QP as the final reading in conducted, in order to claim compliance the limit used must be average. If the peak of QP is under the average limit then no further testing is required. None the less, it is the average limit that must be met when only peak or QP is being used. If the QP is over the average limit but under the QP limit then average measurements are required. Consequently, while still compliant, the device is 10 dB closer to the limits than you report. For example, the actual margin at 170 kHz on page 25 of the EMC report is not -10.24dB under but only -0.24dB under. Please report actual margins to the accepted FCC rules interpretation for conducted emissions when using peak or QP readings.
6. Please note that this is an intentional radiator application under 15.247. The report provided only covers Class B issues (i.e. 15.107 and 15.109). Please provide a report that covers all of the necessary Part C intentional radiator measurements in accordance with 15.247. These include: power measurements of the low mid and high fundamental, bandwidth measurements of the low mid and high fundamental, Band edge compliance measurements, number of hopping channels (79), channel separation, dwell time (worse case dwell), radiated emissions showing compliance to the restricted bands, conducted or radiated emissions showing emissions are at least 20dB below the fundamental, confirmation of sufficient receiver input bandwidth, etc..

A handwritten signature in black ink that reads "Dennis Ward".

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.