



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

August 23, 2005

RE: FCC ID: QMNRM-66_ATCB002700

Attention: Andreas Gillmeier

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. FYI – Please note that while the interference statement in the manual may be appropriate for a part 15 receiver, it is not appropriate nor does it follow the required verbatim statement for other part 15 devices. Please note that as this device contains a 15.247 BT device the manual is required to contain the verbatim statement found in 15.19(a)(3) as follows: “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.” Please consider changing the manual to include this required statement when the manual refers to a device containing a part 15 element other than a receiver. Please note that the FCC may require this statement to be in the manual.
2. Please note that it appears that the Dwell time for this device fails. Please note that the dwell time cannot be greater than 400ms within a period of .4sec time the number of hopping channels or $(0.4 \times 79 = 31.6s)$. This means that the max dwell time in that 31.6 seconds cannot exceed 400ms. The calculations provided on page 15 of the BT report appear to indicate a dwell of 406ms in that 31.6second time frame. This appears to exceed the limit. However, as the protocol testing for a BT device also includes dwell time (generally yielding a max dwell in the neighborhood of 280 to 340ms), it is most likely that an error in measurement has been made. Please also note that it is not possible to adequately see where 140 transmissions is counted. There appears to be less, thus the Dwell may be less than reported. Please only count the peak signals and not those that are 20dB lower as these may be spurs. Please provide dwell data that clearly shows 0.4sec or less dwell in the allotted time.
3. Please note that when reporting AMPS data the following test mode plots need to be provided: ST;, SAT, SAT&ST and Voice using a 2.5kHz tone. Please note that “random modulation” is not an appropriate test in accordance with the FCC rules for AMPS. Please provide the above mentioned data.
4. Please note that as this device is also AMPs capable, please provide the modulation limiting and frequency response data for this mode.
5. Please note that even though the conducted power levels between the EMC and SAR report are within 5%, when there is a difference, the SAR report must show the greater value. The EMC report shows a max AMPS power of 26.1dBm while the SAR shows a max AMPS value of only 25.8dBm. The actual channel 991 values are 26.1dBm vs 25.7dBm. Please explain.

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.