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

August 27, 2004

RE: ARGUSTEAM ENTERPRISE CO., LTD.

FCC ID: SC2M789 or SC2-M789

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

Administrative Issues:

1) The 731 form shows an FCC ID: SC2M789, while several of the exhibits show FCC ID: SC2-M789. Is there a dash or not? Which is correct? Please correct all affected exhibits.
2) The block diagram should show the frequencies of all oscillators in the TX device (CFR 2.1033(a)(5)). Please provide.
3) Please confirm that confidentiality is NOT being requested for the Block Diagram or Schematic.
4) all 3 axis
5) Page 4 of the users manual mentions 2 antennas. Please explain as the remote control device appears to have an integrated antenna.
6) Users Manual appears to be missing the information required from 15.21 and 15.105(b).
7) These devices are typically a pulsed emission device (series of on-off pulses). The FCC does not allow Average measurements to actually be made. A peak to average correction factor must be made from the worse case pulse train (most TX) that can be obtained in any 100 msec period of time. For a sample report see FCC ID: FU5HA51M test report on the FCC site. This correction factor is then applied to the peak readings and compared to the average limits. Please correct the test report appropriately and provide the necessary duty cycle plots. Note in this case it may help show more margin.
8) Since the device is hand held, it must be placed in all 3 axis possible and tested for worse case. note that worse case for the fundamental will not necessarily be the worse case for the spurious. Please provide the missing data.
9) The spurious emissions limits used are not correct (pages 18, 19, 20, 21)). Note that the spurious emissions levels are based upon the frequency of the fundamental and NOT the frequency of the emissions measured (see 15.231(b)(3). For instance, the spurious limits for this device would be 80.8 dBuV/m peak and 60.8 dBuV/m average for spurious emissions based upon a fundamental of 433.92. Additionally, if any emissions fall in a restricted band to table 15.205, the limits of 15.209 must be used if they are more stringent. This will affect the results reported at 111.54, 276.78, 123.69, 3906.01, and 4340.15 MHz. Please correct.
10) Much of the information on page 26 appears in Chinese. Please correct to English.

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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.