



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

July 12, 2006

RE: Global Elite Electronic Company Ltd

FCC ID: UBOVM5602B

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) This device is large enough that the FCC will require the compliance language of 15.29(a)(3) to be placed on the device – not simply in the Manual. Please review your label exhibit and supply a corrected label.
- 2.) The Test Report on page 3 (both reports) indicates that this FM transmitter has an output power according to the manufacturer of 10mW. This level far exceeds the level allowed under FCC rules and should be reconsidered.
- 3.) There is no description in the Occupied Bandwidth measurement for the 15.239 report of what signals were modulating the transmitter during the bandwidth test. Elsewhere in the report there is test data for USB, SD Card, and Aux Input. It is expected that occupied bandwidth measurements would be provided for both analog and digital inputs.
- 4.) Please describe how this device was modified to not transmit directly on 88 and 108 MHz as shown in the original test report.
- 5.) The radiated emissions data for pages 9 to 17 are simply final numbers – there are no antenna correction factors, cable loss values, etc. It is not possible to verify these numbers. Kindly provide measured values, cable losses, antenna factors for all emission measurements. This is doubly important because the original test data showed some spurious emissions higher than the fundamental.
- 6.) Kindly describe within the 15.239 Test Report steps taken - including any circuit modifications - to bring this device into compliance.
- 7.) The Block Diagram provided [UBOVM5602B_Block Diagram Rev 1.pdf] appears identical to the original Exhibit. Maybe I need new glasses, so please show me how this exhibit has changed.
- 8.) The ATCB website has no record of receiving any modified files for either the Internal or External photographs. Kindly provide revised photographs.
- 9.) No test data was provided confirming the DH1, DH3 and DH5 dwell times. Please provide DH1, DH3, and DH5 plots for time of occupancy. It is not necessary to provide all three modes on all three channels. A zero-span mid-channel frequency showing DH1, DH3 and DH5 is all that is required.
- 10.) Radiated emission data spreadsheets on pages 32, 33, and 34 of the 15.247 test report are simply not filled in. It is impossible to assure compliance with a “blank table”. Please provide antenna factors and cable loss in addition to peak or average readings. You are reminded that both hopping and non-hopping modes must be investigated.
- 11.) The example calculation on page 36 of the 15.247 Test Report does not have any example values. Kindly demonstrate that sufficient measurement system sensitivity exists for making restricted band measurements at higher frequencies exist using a 1MHz RBW within the 17.7 – 21.4 GHz band on a 3M site.
- 12.) Neither Test Report identifies the subject device by FCC ID. Please review. This is an FCC reporting requirement

A handwritten signature in black ink, appearing to read 'William H. Graff', with a stylized, cursive script.

William H. Graff
President and Director of Engineering

[mailto: whgraff@AmericanTCB.com](mailto:whgraff@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.