



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

January 22, 2007

RE: FCC ID: AFJ297900_ATCB004457
Attention: Tri Luu

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 check the emissions designators on the 731 to make sure they are in alignment with the new FCC interpretation on frequency listings on the grant as follows:

Licensed transmitters

Generally, list only allowed frequencies in rule part applied for. However, contiguous frequency ranges that extend allowed frequencies and include adjacent frequencies outside the applied rule part are allowed under the following conditions. All of the following must be adhered to. a. Extended frequency ranges in the line item must have portion of the band fall within the operating range of the rule part(s) listed. b. Frequency range and rule part combos solely outside USA frequencies are not allowed. The device must be capable of operating on frequencies in the frequency band listed. c. Any frequency in extended frequency range must not conflict with any rule part with different specifications. In this case, the following must be evaluated. 1) Rule parts applied for and allocation chart in 2.106 are used to check for allowed frequencies or show conflicting frequency range. 2) Portion of band must not be used solely for a rule part not applied for unless justification in (e), below, applies. Consider splitting rule parts in different line items to remove ambiguity if needed. d. For multiple rule part line item, tighter specs must apply where frequency ranges are common between rule parts. e. The filing must have a justification letter for extended frequencies outside of applied rule part. Operation must be justified under 2.807. For example, Government / Military use or exportation to other countries has been allowed. • Justification letter from grantee must indicate marketing plans to ensure USA users, other than those specifically identified, cannot operate device outside bands allowed under the relevant rule parts applied for. f. Frequencies must adhere to the following additional requirements below. 1) Part 87 listings must have only Part 87 frequencies. Extended frequencies not allowed for Part 87 devices. 2) Device must not be capable of operating under 406-406.1 MHz unless rule part applied for specifically allows it. g. Test guidance i. Test only on allowed frequencies. ii. Test at least one frequency, unless required to test on multiple frequencies, in each band for each rule part applied for and ensure the device is capable of operating on the frequency in each rule part. Test on one frequency may be accepted if multiple listed bands for a rule part with a continuous frequency range listing, if the listed bands are split to remove a conflict with other rules and the technical requirements in the split bands are the same. Other requirements for RF exposure may apply. h. **All Certification grants with extended frequencies must have the following grant note:** This device contains functions that are not operational in U.S Territories except as noted in the filing. This filing is only applicable for US operations.

These policies include certain frequency ranges (i.e. 136-150MHZ). Please review the above policy and correct the 731 form and other documentation as necessary to be in line with this new interpretation.

2. Please note that additional comments may result depending on the response to the above.

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.