

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

May 22, 2005

Supplemental comments

RE: FCC ID: BV8VTAC800_ATCB002435

Attention: Rick McMurray / Kathy Grzovic

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 note that the 731 states the power of this device is 24.6W. Pages 1 and 12 of the report also state 24.6W. However, the spurious emissions data shown on page 43 of the report state that the conducted high power is only 15.14W (which appears to be from the occupied bandwidth plots). Please note that radiated ERP limits for spurious emissions are to be compared to the measured ERP power measurements of the fundamental, and not conducted power measurements or occupied bandwidth measurement data, as would be indicated in the report. While the end result of the formula $43 + 10\log(P)$ is -13 dBm for all of the above instances, -13dBm is not the limit to which measurements are being made. As it is the dBc values that are stated in the report, these values should reflect the correct units etc. The report references incorrect dBc limits and does not agree with the conducted power measurements reported on page 1 and 12 of the report nor is there ERP antenna substitution measurements to support dBc values for radiated spurious emissions. Please explain and please compare the radiated spurious ERP emissions using the proper and correct power levels and values.

Response: Regarding using ERP vs conducted measurements for the spurious comparison, per previous certifications (see correspondence for ATH2425170) and a telephone call discussing this subject with you, Bill Graff and myself (Rick McMurray) on July 15, 2004, we kindly request that we leave the comparison against the conducted power.

Regarding the conducted power values on pages 41 and 42 not matching the power reported on pages 1 and 12, the EUT is comprised of two individual transmitters joined through a combiner. In worst case operation, both transmitters can transmit simultaneously, but always on separate frequencies. For the spurious data presented on pages 41 and 42, the transmitters were operating simultaneously (to represent worst case), but the emissions from only one of the transmitters was individually evaluated in each case (since we were not only focusing on the spurious emissions, but from the harmonics generated by the specific transmitter being investigated). We chose this approach as it puts more stringent limits on the emissions from each of the transmitters while operating simultaneously (as opposed to using the combined total power as reported on pages 1 and 12).

2. Please note that the manual separation distances listed do not agree with the MPE report distances. Please address the inconsistent MPE distances in the various documents. Please be consistent in reporting MPE.

Response: Please refer to the revised installation and operations manuals uploaded with this response.

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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.