



American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

October 1, 2003

RE: FCC ID: CNTPP3006_ATCB000808

Attention: Mary Ellen Clayton

I have a few comments on this Application.

Documentation

1. Please provide the letter of authorization form the manufacturer giving authority for CKC to act as agent for this LMA.
2. Please note that this is an LMA application. In recent TCB council meetings with the FCC they have stated that external photos of the host device need to be provided for an LMA approval. Please provide external photos of the host in which this transmitter will be used. -
3. Please note that on page 1 of the internal photos there is an rf shield covering part of the circuitry. Please remove this shield and provide photos of the circuitry underneath this shield.
4. Please note that on the FCC ID sample label exhibit you have two labels. One identified as MOW has the FCC ID number, and one identified as ROW is without the FCC ID number. Please explain.
5. Please note that the host contains a Bluetooth transmitter. It is assumed because there is no data on this Bluetooth transmitter that it is an already approved device. If the device is a USB type peripheral, nothing need be done. However, if it is an approved Bluetooth module, it is required that a label stating "Contains TX FCC ID:XXXX" (or similar) be on the host. While not necessarily part of this application, evidence that this label is placed on the host as required by the FCC needs to be provided. Please provide evidence that the host is properly marked for this Bluetooth transmitter (i.e. the Bluetooth label mentioned in the documentation).
6. Please note that the manual states that regulatory information can be found in the "*Documentation Library CD*". While this approach is OK, the regulatory information must still be provided for review at the time of certification. Please provide the necessary documentation from this CD that addresses all appropriate FCC statements and warnings. These include the rf exposure statement for SAR compliance and the 15.21 non-modification statement etc.
7. Please note that there appears to be more than ample room on the host to accommodate the 2-condition statement of 15.19. Please provide the sample 2-condition statement that is to be on the device. Alternately, please explain how this device adequately meets the exemption requirements of 15.19(a)(5).

EMC report

8. FYI – no action needed. Please note that there are no limits for antenna terminal conduction testing for receivers above 960MHz. As such, this test (15.111) is not required.
9. Please note that the FCC accepted test procedure for DTS devices of Oct 2002 states that the proper resolution bandwidth for making the 6dB bandwidth measurements is 100kHz with the video bandwidth equal to or greater than the resolution bandwidth. Please note that in the plot on pages 12 through 21 of the report you show resolution bandwidths of 5MHz and video bandwidths of 3MHz (video bandwidth less than resolution BW). While the 6dB bandwidth of the 802.11b device is greater than that required, measurements should be done in accordance with the accepted FCC procedures. Please explain why measurements were made that were not in accord with the established FCC accepted procedures.
10. Please note that your PPSD (Power Spectral Density) was not measured in accordance with accepted FCC procedures. While the device may be compliant, the proper measurement of PPSD is with a resolution BW of 3k, a video BW of 3K and a sweep time of span/3k). Your span exceeds 100MHz. In order to measure the PPSD within any 3kHz band as required by the FCC, the proper sweep time for your setup would then be in excess of 33,000 seconds. Your sweep time is listed as only 27.3 seconds and thus is not properly measuring the power density in a 3kHz band and may not be reporting an accurate PPSD. Please provide PPSD measurements in accordance

with the required FCC accepted procedures. Alternately, please explain how a 27 sec sweep with a span of 100MHz is capable of properly measuring the FCC required PPSD in a 3 kHz window.

11. Please note that your "Peak Output Power" procedure listed on page 49 of the report does not match that of the listed procedure on page 22 of the report. Please explain.

SAR report

12. FYI – no action required. Please note that direct contact SAR cannot be evaluated by TCB's. Also, please note that direct contact SAR (sometimes referred to as hand wrists feet etc) is not needed nor desired in certifications by TCB. As the FCC does not require this information, it will be ignored in the review of the SAR report and will not be mentioned on the grant.
13. Please note that in the conversion of the original SAR report to the PDF file provided errors evidently occurred. Please note that on a number of pages a question mark (?) shows up rather than the proper term or value. Please correct the SAR report to appropriately show the proper terms and values.
14. Please note that TCBs must use 1528 and OET 65C. Section 5.2 of the SAR report states that 1528 section 7 was used "where applicable". Please explain, if any, the parts of section 7 of IEEE1528 that were not 'applicable" or that was not followed.
15. It would normally be expected that some power drift between the before and after power measurements during testing would occur. The data table in section 6.1 of the SAR report states that there was no (immeasurable) power drift between the before and after time frame. This seems unusual. Please explain (i.e. measurements were only done to tenth dB accuracy, etc).
16. Please note that data for graphs 2 and 4 (body SAR) have been provided. However, the data associated with graphs 5 through 9 has not. Please explain and please provide the associated measurement data with the graphs.
17. It is not clear if SAR was evaluated with both the WLAN and Bluetooth device operating simultaneously. As the power of the Bluetooth transmitter has not been disclosed, what has been done to evaluate the affects on SAR of the Bluetooth transmitter operating in conjunction with the WLAN?



Dennis Ward
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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.