



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

June 30, 2004

RE: FCC ID: CNTWM3B2200BG_ATCB001433
Attention: Kyle Fujimoto / Luis Olvera

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 this supplement is the result of reviewing the EMC report provided by Kyle this morning. Please note that this device as submitted does not fit into the PC2 category. The reason for this decision is the fact that the conducted power listed on the grant is only 56mW (approx 17.5dBm) while the conducted power measured by the lab is 197mW (approx 22.95dBm). This is 5.45dB increase in power. The FCC has made it clear that conducted power must be within +/- 0.5dBm of the original power in order to qualify for a PC2. As this device as tested is about 3.5 times the original power listed on the grant (197mW as opposed to the listed 56mW) it does not meet the criteria for a PC2. If you wish to apply for a new FCC ID please be aware that all documentation must be provided for an original application.
2. As this device does not meet the criteria for a PC2, if a new grant of authorization is sought, the SAR conducted power must be within 5% of the power listed in the EMC report. As the power listed in the SAR report is 1.95dB under that shown in the EMC report, it too will have to be retested. Please note that the FCC has stated that conducted power measurements between the SAR and EMC report are to be within 5%. If there is a difference, then the SAR report must be the greater. As the EMC is 1.95dB higher conducted power than the SAR measurement, the device does not appear to have been tested at the maximum power available from the device. If a new FCC ID grant is to be applied for, please provide an EMC and a SAR reports that meet the criteria set forth by the FCC in their SAR evaluation checklist (i.e. within 5% conducted power and if different the SAR must report the higher power).

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.