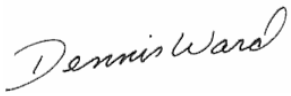
American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

October 14, 2004

RE: FCC ID: CNTWM3B2200BG_ATCB001798
Attention: Kyle Fujimoto

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 on pages 95 and 98 of Appendix E of the test report the average plot lines appear to have an anomaly that brings the data into question. Please note that at approximately 250 kHz the plot line drops to a flat line below the lowest graticule on the analyzer. This indicates that possibly the signal has been interrupted or lost. Please explain and/or please provide evidence that proper measurement data was taken.
2. Please note that there does not appear to be data showing the emissions results of co-transmission of both the WLAN and Bluetooth device. Please note that the FCC has stated that this data is to be provided. The concern is how the BT device and the WLAN device may produce intermodulation products which may cause failures in the restricted bands. Please provide data showing radiated emissions with both the BT and WLAN operating simultaneously. Alternately, please explain how the devices are prevented from operating simultaneously.
3. Please clearly indicate where the antenna(s) for this device are located in the host. The existing photos do not allow for clear distinction of antenna location.
4. Please note that the manual states that the antenna(s) used with this host are 20cm separated from the user (see page 9 of the manual). Please note that SAR has been provided which indicates that the device is used within 2.5cm of the persons body. Please be consistent in the application for rf exposure. Please provide a manual with the proper SAR information for this device.
5. Please note that the SAR report states that the power of this device is 24dBm yet the EMC report states the highest power is 17.65dBm. Please note that SAR and EMC powers MUST agree within 0.5dB for conducted and within +/-3dB EIRP for any specific granted device. The variance in measured power in this host device is greater than 6.35dB. This is not allowed. Also, please note that while SAR may have been tested to a more conservative level, this is not the intent of the application. The intent of application data is to provide evidence of how the host and transmitter work in conjunction with each other AS SOLD, and is not to determine any supposed extreme SAR value. As the module used in this device is only approved for use at 56mW (+/- 5% conducted power), not 100mW, SAR should only be performed using the modules maximum allowed power. As the actual SAR values for this power level are what is to be on the grant, it is this level (17.65dBm +/-0.5dB as measured in the EMC report) to which the system must be tested. Please provide SAR data within the allowed 0.5dBm of that measured in the EMC report as clearly specified in the accepted OET SAR checklist.



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.