



American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

December 3, 2003

RE: FCC ID: H8NWLL0010_ATCB000963

Attention: Ellis Wu

I have a few comments on this Application.

1. FYI - Please note that your modular request letter states Limited Modular Approval. Please note that an LMA is for a specific host where the ID would be on the outside of the host. This is a modular approval application for use in mobile configurations. The modular approval letter should state modular approval not limited modular approval. **X**
2. Please note that the operational description and section 4.7.2 of the report states the antenna connectors are UFL. However, the schematics indicate that the connectors are SMB. Please explain and/or correct as necessary.
3. Please note that on pages 24 to 26 of the report you have listed frequencies that are not restricted band frequencies. Consequently it is not subject to the limits of 15.209 but to the -20dB from the peak of the fundamental. You have incorrectly compared these frequencies to the restricted band limits. As these frequencies are all at least 30dB below the fundamental average reading, please either report margins to the correct limits or please remove them from the list of measured frequencies. The frequencies of concern are page 24 – 9648 and 7236MHz; page 25 – 9748MHz; page 26 – 9848MHz. **X**
4. Please note that the installation manual **must provide the OEM integrator with antenna installation instructions and transmitter operating conditions for satisfying RF exposure compliance.**" This means that since this is a mobile only installation requiring a minimum of 20cm separation distance from the user when installed in the final host, while the final user manual only need state that the device meets the rf exposure requirements, the installer must be made aware of the separation distance condition. You have only informed the OEM integrator not to collocate the antenna. Please provide an installation manual that properly informs the OEM integrator that this is a mobile only device requiring 20cm separation. **X**
5. Please note that the suggested statement for the end user on rf exposure compliance is misleading. It indicates that the only factor involved in rf compliance is not to collocate the antenna. This is not accurate. Your suggested statement states, "To comply with FCC RF exposure compliance requirements. The antenna must not be co-located or operating in conjunction with any other antenna or transmitter." More importantly it is the separation distance that is required to meet rf exposure compliance. A more accurate statement that is not misleading needs to be provided to the end user. Please either include the 20cm separation distance as part of your compliance statement, or alternately, simply state that the device in the final host meets the rf exposure requirements of the FCC for mobile devices. **X**

A handwritten signature in black ink that reads "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.