



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

October 26, 2006

RE: Hand Held Products

FCC ID: HD5760002

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Please review page 3.2 in the Manual. This device is designed to support voice communications with a built-in microphone. This implies to me that it is capable of either face-held or ear-held positions. The RF Pout quoted on Form 731 is above 150mW, and consequently above the "Low Threshold" limit shown in the TCB Exclusions List. Therefore, SAR testing in either face-held or ear-held positioning shall be required.
- 2.) Please note that distinctions between SAR levels in 802.11b or 802.11g mode are irrelevant. However, distinctions between head and body SAR levels are appropriate. Please be sure both body and head SAR are shown in the Manual.
- 3.) Section 8 of the Manual appears to imply that the end user may be able to add any WiFi transceiver. How is it assured that only specific types of WiFi radios are installed into this product? Kindly list the radios which are approved for use with this device.
- 4.) I note the "zero-config WiFi" feature is disabled on this device. That implies to me that you may be using your own software. How do you insure that end users can set this device to only operate on the 11 channels allowed for 2.45GHz WiFi in North America? Please note that any operation which allows users to select country or region is insufficient to guarantee compliance with 15.15(b).
- 5.) Can this device be set up for peer-to-peer operations? If so, then is it possible for this device to link with another device set to channel 13?
- 6.) Please refer to your Test Report, Section 3. How did you determine the maximum power across all data rates in each of Mode 1 or Mode 2?
- 7.) I note that you are using a VBW for band edge measurements considerably greater than 10Hz. This implies to me that the test software was not capable of a true "CW" mode, and was instead pulsing. Can you kindly provide details about the transmitter duty cycle observed? Additionally, this duty cycle may influence the results of SAR report. Was the duty cycle of the transmitter accounted for during SAR testing?

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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.