



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

October 1, 2008

RE: FCC ID: IBAAVPSB1120_ATCB006794

Attention:

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 the test report says there are two transmitters in the device; however, the internal photos appear to only show one transmitter. Please explain and please clearly identify both transmitters in the internal photos.
2. Please show photos of the bottom of the transmitter modules.
3. Please note that band edge compliance is not shown by an overall plot of the 6 highest emissions but is instead shown by selecting the lowest frequency generated at the highest power and showing the lower band edge and then selecting the highest frequency generated at the highest power and showing the higher band edge. Please show plotted data of these two frequencies in relation to the appropriate band edge. Please follow the appropriately approved test procedure (i.e. KDB558074_15-247 DTS test procedure) for band edge requirements.
4. Please provide the resolution BW and Video BW settings used for conducted spurious emissions plots on pages 21-26 of the test report.
5. Please note that you must provide not just the final data values, but you must provide the actual data including cable loss, antenna factors, amplifier factors (if and) and you must provide the formula used to account for these factors. If these factors are included in the analyzer settings, then you must provide an explanation as to how the analyzer accounts for each and give a sample of this calculation. Please provide all appropriate data. Please also provide that analyzer/receiver band width setting used when making peak and average readings of spurious emissions.
6. Please note that 15.247 occupied band width measurements are to be performed in accordance with the appropriate test procedure. Please note that this test procedure requires that the res bw of the analyzer is to be set to 100kHz and the video bandwidth set to 3 times the res bw. In no circumstance is the video bw to be less than the res bw. Your data on pages 33 - 36 uses a res bw of 1MHz and video bw of 3MHz. The plots on pages 37 - 40 use the same res bw but a 300kHz video bw thus doing video averaging (this is not allowed). None of these plots are in accordance to approved test procedures. . Please provide 6dB band width plots that are in accordance with the prescribed and approved FCC test procedures.
7. Please note that the spectral density data between the two transmitters are significantly different, indicating the two transmitters are not operating in a similar fashion. The operational description is not clear on this fact. Please explain why the spectral density data shown in the plots is so different between the two transmitters. Please do this as an additional document to the operational description exhibit.
8. Please verify that the two transmitters do not transmit at the same time. If they do, please address collocation issues.

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. Except as described in §0.459, correspondence and responses 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.