



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

August 7, 2008

RE: FCC ID: MOIPULS67_ATCB006620

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 all part 15 applications must contain the schematics of the rf device. Please provide the schematics for the device.

Response: Please refer to the schematics uploaded with this response.

2 Please note that as the request for confidentiality does not mention schematics; consequently, if the schematics are desired to be confidential you will also have to provide a revised confidentiality request letter listing the schematics as well.

Response: Please refer to the revised FCC and IC confidentiality request letters uploaded with this response.

3 Please note that the formula used on page 8 of the test report is confusing. For example in the formula Average result = Spectrum Analyzer Level (dBμV) + SCF (dB/m) - DC (dB) you appear to be adding 53.4dB then subtracting 53.4dB. Please note that the formula given for SCF is $AF + CL - AG + PDF$. *Page 7 states that $PDF = 20\log(\tau_{eff} \times PRF) = 53.4dB$; yet you also state that DC is Duty Cycle (DC) = $20\log(\tau_{eff} / T) = 53.4dB$. It appears that $DC = PDF$. Consequently, Average result = Spectrum Analyzer Level (dBμV) + SCF (dB/m) – DC is also = Spectrum analyzer level + AF + CL – AG + PDF – PDF (as PDF = DC). Maybe I am missing something as you state τ_{eff} = Pulse width PRF = Pulse Repetition Rate for line spectrum when RBW is less than $0.3 \times PRF$. If PDF = DC why are you including it in the formula in the first place? Please explain.*

Response: The Duty Cycle calculation is $20\log(\tau_{eff}/T)$, this is correct for determining the average voltage value, this would have been $10\log(\tau_{eff}/T)$ if one were calculating the average power value. The PDF value calculation defined in HP Application 150, is $\alpha = 20\log(\tau_{eff} \times PRF)$ when the EUT is in line spectrum mode. Line spectrum mode would occur if a pulse were present to be measured when the analyzer bandwidth $B < 0.3PRF$. The PDF value is independent of RBW value in line spectrum mode, the PDF value happens to be the same as the DC value in this case, but PDF values do not always equal DC values, especially when the EUT is in pulse spectrum mode, in which case, the analyzers bandwidth has to be taken into consideration for PDF calculation.

4 Please note that while 15.109 and possibly 15.107 allow the use of CISPR22 limits, intentional radiator rule parts do not and the limits are defined in the particular rule part. Please note that the limits shown in the table on pages 10 and 11 of the report for 15.207 show CISPR B limits. Please note that this is an intentional radiator the must meet the limits of 15.207 nor CISPR B (even though the actual limits may be the same or similar). Please refer to the proper rule part and limits.

Response: Please refer to the revised FCC test report uploaded with this response.

5 FYI - Please note that even though the report states no discernable emissions were found, the FCC requires reporting at least 6 readings. Since plots have been provided this is only an FYI – however, please consider reporting the required 6 emissions in the future.

Response: Noted; FYI there were no emissions to be reported. Since the EUT was configured in tanks, all emissions were contained in the tanks.

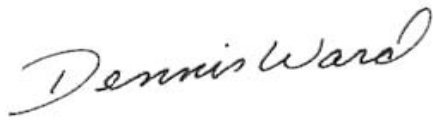
IC

6 Please note that the MPE calculation sheet provided for IC does not meet the documentation requirements of IC. Please note that IC requires the specific annexes A and B of RSS102 to be completed and uploaded to the IC site at the time of FCB notification. Please provide a completed and signed RSS102 annex A and B.

Response: Please refer to RSS 102 Annex A and B uploaded with this response.

7 Please explain why the table on pages 13 through 15 of the IC report state FCC Limit. Please note that the device must meet the IC requirements of RSS210. Please correct the table to reflect IC requirements.

Response: The revised IC test report uploaded with this response reflects the IC requirements.



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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.