



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

December 28, 2006

RE: Novatel Wireless Technologies Ltd.

FCC ID: NBZNRM-EU870D

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

- 1.) As a reminder, please be sure that the contact information listed on Form 731 matches the FCC database. All supporting documents, such as Confidentiality request or POA, must be signed by a responsible party at Novatel
- 2.) Kindly define the exact frequency range to be used on this device on Form 731. Devices with no channelization defined within the FCC Rules must show the center frequency of the lowest channel to the center frequency of the highest channel for each applicable modulation.
- 3.) FCC rules require External and Internal photos as separate Exhibits. Please segregate your photos into two Exhibits.
- 4.) The photographs show an antenna with the equipment. Will this antenna be supplied with all devices?
- 5.) FYI: A Licensed module of this type which does not have an antenna supplied by the manufacturer could show the conducted power on the Grant. Shall the conducted power be shown on the Grant or only radiated?
- 6.) Kindly elaborate on the Operational Description. What is wanted is a description of how the RF energy is created, modulated, and finally amplified within this device.
- 7.) Please provide a Tune-Up Procedure for this device. If no provisions are available for field adjustment, at minimum a description of how this device is tuned up during production is required. Remember to provide RF power tune-up target values and tolerance.
- 8.) A Part 15B Test Report is provided. Are you also seeking Certification as a Class B computer peripheral? If so, kindly provide additional justification for this testing. I do not see how Part 15B Certification would apply to this device. Please refer to 15.101.
- 9.) FCC interpretations request separate emission designators for GSM, EDGE, WCDMA and HSDPA. Please provide emission designators on Form 731, and provide justification for each emission within the Test Report.
- 10.) Kindly check your Test Results in Section 4.3.4. The channel frequencies shown appear incorrect. Please review.
- 11.) Please review your tabular data in Section 4.6. FCC rules specify that all spurious emissions should be measured to the 10<sup>th</sup> harmonic. Yet the supplied tabular data does not go nearly that high in the frequency domain. It is much easier to prove you have satisfied this search requirement if some kinds of values are shown – even if there are no significant emissions. Kindly consider providing tables of all harmonic content to the 10<sup>th</sup> harmonic. In addition, your plots only go to 13GHz – you have not proven you have searched the expected spectrum. Tabular data is also more compact. Note that you could easily eliminate most of the wideband plots using just tables.
- 12.) Please remember to supply an OEM integrators manual for this device.
- 13.) Please supply a label and indicate label placement on this device.

William H. Graff  
President and Director of Engineering

[mailto: whgraff@AmericanTCB.com](mailto:whgraff@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.