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

October 30, 2002

RE: Wistron NeWeb Corporation

FCC ID: NKRBT510

After a review of the submitted information, I have a few comments on the above referenced Application.

These comments are all made upon the assumption that the EUT's full conducted output power is 1.04 mW and the antenna gain is -1.0 dBi.

1) The revised test report states that the average values were obtained from the duty cycle of the transmitter, but the values for the spurious emissions (delta between peak and average) do not agree with this. Also, the duty cycle presented was based upon your measurements with the transmitter in a non-standard transmit configuration. For purposes of this application, this is not correct. The PEAK data may be corrected by the worse case duty cycle expected for each channel during actual use. Average measurements are not necessary but only calculated values based on actual worse case usage conditions.

   Note that Bluetooth theory of operation explains 3 different packet lengths that may be used in modes with different packet sizes. The theory of operation for Bluetooth states that their may be 1, 3, or 5 slots used for a transmit dwell time on a channel depending on the mode of operation. For a DH1 packet the TX is on 0.625 us per 49 mS per channel, while for a DH5 packet the TX is on 0.625 * 5 per 247 ms per channel. These duty cycles equal the following: 20 log (.625/49) = 37.9 dB or 20 log (3.125/100) = -30 dB. All are greater than the 20 dB difference between the peak and average limits. However, the report should clearly identify the worse case duty cycle (based upon Bluetooth theory) and the data corrected appropriately.

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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.