

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

March 28, 2001

RE: FCC ID: NTRNSA1800

I have a few problems with this application that much be addressed. You are cautioned that transmitters, which do not meet the RF power Categorical Exclusion rules of 1.1307, are not eligible for TCB approval. For equipment in this frequency range this is defined as 1.5 Watts conducted, and 1.5 Watts EIRP. All others must be filed with the FCC.

- 1.) The Product Description refers to this as a module. All licensed modular approvals are currently excluded from the scope of TCB authorization. Please explain.
- 2.) A simpler RF exposure equation exists in OET Bulletin 65. See Section 4: Prediction Methods,; Equations for Predicting RF Fields. Equation 4) is most commonly used by simply re-arranged to solve for R. Be sure to enter your EIRP in milliwatts. S would represent the limit.
- 3.) Power output on 731 does not match RF exposure evaluation.
- 4.) The file for External Photos would not open. Please upload again.
- 5.) For clarity, calculated method in 3.1 in the test report should not even be mentioned.
- 6.) Radiated ERP using the substitution method is usually much more accurate than +/- 1.5 dB. Variations of 40% are a bit high.
- 7.) Occupied Bandwidth looks much better.
- 8.) Tx Radiated and Conducted spurs well presented.
- 9.) Graphs in Section 8.2.2 and 11.2 will never print properly on B&W printers. If possible please remove gray background.
- 10.) Please provide a listing of instantaneous deviations of all signals listed in 22.915(b).
- 11.) Please provide explanation of ESN encryption under 22.919.
- 12.) Please provide attestation to 22.933.
- 13.) Will only 2.15 dBi antennas be used with this device? Please provide listing of all applicable antennas.
- 14.) Confidentiality letter is not on Applicant letterhead.
- 15.) Please identify where in the application I can find the DC I and E to the finals per 2.1033(c)(8)
- 16.) There are no installation instructions to assure this equipment will be properly installed in compliance with the fixed or mobile transmitter distance rules.
- 17.) The contact information for "NTR" is incorrect. Please inform Bette Taube at FCC.
- 18.) What is the relationship between Niigata and Fluent? Would it not be best if Fluent be the Applicant?



William H. Graff
Examining Engineer
President and Director of Engineering

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal pursuant to Section 2.917(c). 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 reply to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must attach your answers to email correspondence. Reply to the examiner at the email address shown below. 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 e-mail address listed below the name of the sender.