

**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.

This is not an application for a modular approval. We have corrected the Product Description and provided a new document..

- 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.

**Noted. Thank you**

- 3.) Power output on 731 does not match RF exposure evaluation.

The 731 Form has been corrected and is provided.

- 4.) The file for External Photos would not open. Please upload again.

Submitting new file. Please let me know if you still have problems

- 5.) For clarity, calculated method in 3.1 in the test report should not even be mentioned.

Calculated method in 3.1 has been removed from the report. Please see the Revised Report Body

- 6.) Radiated ERP using the substitution method is usually much more accurate than +/- 1.5 dB. Variations of 40% are a bit high.

**Noted. Thank you**

- 7.) Occupied Bandwidth looks much better.

**Noted. Thank you**

- 8.) Tx Radiated and Conducted spurs well presented.

**Noted. Thank you**

- 9.) Graphs in Section 8.2.2 and 11.2 will never print properly on B&W printers. If possible please remove gray background.

Background was changed per your request. Please see the Revised Report Body

- 10.) Please provide a listing of instantaneous deviations of all signals listed in 22.915(b).

Please see section 11.2 of the revised report body.

- 11.) Please provide explanation of ESN encryption under 22.919.

Attestation is provided. Please see Attestation Letter provided in cover letter.

12.) Please provide attestation to 22.933.

Attestation is provided with number 11 of this document. Please see Attestation Letter provided in cover letter.

13.) Will only 2.15 dBi antennas be used with this device? Please provide listing of all applicable antennas.

Please see the files uploaded in RF Exposure file on the ATCB Web Site

14.) Confidentiality letter is not on Applicant letterhead.

Rhein Tech Laboratories, Inc. is acting as agent for the applicant and can send the letter on their behalf. In section 0.459 of the FCC Rules and Regulations it is not stated that a letter head must be used for a confidential letter. It does however list other requirements.

15.) Please identify where in the application I can find the DC I and E to the finals per 2.1033(c)(8)

Please see Section 13 of the revised report body.

16.) There are no installation instructions to assure this equipment will be properly installed in compliance with the fixed or mobile transmitter distance rules.

Revised manual is provided. Please see Revised Manual.

17.) The contact information for "NTR" is incorrect. Please inform Bette Taube at FCC.

Noted will take care of this matter.

18.) What is the relationship between Niigata and Fluent? Would it not be best if Fluent be the Applicant?

Fluent is acting as agent for Niigata. I have already made the suggestion but they do not want to do this for this application but probably will for future applications



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.