



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

October 19, 2007

RE: FCC ID: OW3PD-17_ATCB005531
Attention: Emily Chen

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 the chain of authorizations is convoluted and confusing. Mr Detlev Aust is the recognized contact person for Nokia GmbH. The authorization letter is from a Mr Oliver Diener who apparently authorized Lite-On Technology Corporation. A second authorization letter from Nokia GmbH was signed by a Mr Charger Hsieh who apparently authorized Quietek. Who is Mr Oliver Diener and what gives him authority to sign for Mr Detlev Aust? Who is Mr Charger Hsieh and what gives him authority to sign also for Mr Detlev Aust? Please note that authorization to act must be clear and non-ambiguous. A proper chain of authorization would be approval from Mr Detlev Aust to allow Mr Oliver Diener to sign for him, then approval from Mr Oliver Diener to Lite-On (this we have – we just need to know who and why Mr Diener is on the letter), then a letter from the appropriate signatory from Lite-On to give authority to Quietek. Please provide a clear and traceable chain of authorization which allows Quietek to act as agent for Nokia GmbH.
2. Please note that the confidentiality request is signed by a Mr Charger Hsieh listed on the letter as an Engineer working for Nokia GmbH. Who is Mr Hsieh? Please provide evidence that this person is authorized to sign documents for Nokia GmbH.
3. In an email you mentioned that the applicant will be removing the FCC logo and putting the 15B under the FCC ID. If so, please provide a new label with the FCC logo removed and please provide the necessary part 15B test report in the appropriate ANSI C63.4 computer peripheral device setup.
4. FYI – Please note that BT devices under 5mW are not subject to rf exposure examination. No MPE report is needed for these types of low power devices.
5. Please note that the FCC statement on page 52 of the manual infers that this is a telephone. Please note that as discussed in emails the generic statement provided should be changed to reflect the actual device. As such the reference to 'telephone' should be changed to a reference to this particular device. It is suggested that you change "Your device may cause TV or radio interference (for example, when using a telephone in close proximity to receiving equipment). The FCC or Industry Canada can require you to stop using your telephone if such interference cannot be eliminated" to something more conducive to your actual device such as "Your device may cause TV or radio interference (for example, when using this device in close proximity to receiving equipment). The FCC or Industry Canada can require you to stop using your device if such interference cannot be eliminated." In any event the statement is not correct for the device seeking certification and needs to be changed to reflect the actual device.
6. Please note that in the test setup photos the EUT appears to be sitting in a fixture. It is not possible to determine from the photos what the fixture is made from. Thus it is not possible to determine if the fixture is made of conductive or reflective material. Please explain the content of the fixture and please verify that the fixture neither absorbs nor reflects rf energy in the 2.4GH and above frequency range. If the material is conductive or reflective in that range, please retest using a material that is not conductive or reflective.
7. Please note that specific test procedures must be used when testing FHSS devices. This test procedure is found in DA00705. The test report, while indicating ANSI C63.4 test setup and cable manipulation, does not give reference to the properly accepted test methods and the written test procedures from the report do not clearly indicate that the proper test methods accepted by the FCC have been used. Please clearly define and use the accepted test methods.

8. Please note that the OBW plots in the report do not look like the typical BT modulation scheme. This could be due to the res BW chosen for the plot. Please explain how the channel was modulated for OBW measurements.
9. Please note that for the 15.239 tests, while you state that you used an MP3 1 kHz modulation, you do not clearly state the input level to the device. Please note that 15.239 devices are to be modulated using a maximum possible input level to the device. This is to show that the input at maximum does not cause the device to splatter, exceed the bandwidth limitation or to exceed the output limits. Please provide the input level used during testing. If the maximum input level was not used, please retest using the maximum input level capable for the device seeking certification.
10. Please note that it is not possible to make a reliable band edge measurement using a span of almost 1GHz. While they may have some validity for radiated spurious emissions from 30MHz to 1GHz they have no such validity when trying to show emissions at the band edges. Please note that a properly measured Band edge plot should show the edge of the modulated signal and have a span only wide enough to verify band edge. For this type signal the band edge frequency should be centered on the analyzer and the analyzer settings should have a span of no more than 500kHz would be sufficient. Please provide a properly measured band edge plot for the upper and lower band edges of 15.239. Please also provide the video bandwidth settings for the analyzer.
11. Please note that the above issues apply to the RSS210 report as well. Please address both IC and FCC in your response.



Dennis Ward

<mailto:dward@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.