

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

July 2, 2004

RE: FCC ID: OWDTR-0023-E_ATCB001457

Attention: Rick McMurray / Kathy Grzovic

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 page 6 of the report states the device is to be held 2 inches from the face and page 8 of the report says the device is to be 3 inches from the face. Please explain and please be consistent in the documentation.

Response: I am unable to locate the references you make. Please provide the file name, and the location of the 2" and 3" distances on the respective pages.

2. Please note that the tables on pages 18 and 19 of the report are confusing. Please note that when measuring the ERP of radiated Spurious emissions you are to use the ERP of the device. While the end result is typically -13 dBm, if -13dBm is not listed as the limit then the numbers do not match to what is supposed to be. For example in the first entry on page 18 you say the results are 48.12dBc. However since this is referenced to the conducted power, the margin stated is incorrect. 48.12dBc from the conducted power would be just at -13dBm and this then brings compliance into question. Also, the margin you state appears to be the result of subtracting the number you refer to as 'dBc' from the number you refer to as 'antenna gain'. As it is unlikely that the substitution antenna gain is in the neighborhood of 70+dB, it appears that the report has not stated the proper values and proper columns. Please correct the report to show all proper factors and please compare the results in the table to either -13dBm or dBc from the ERP values of the fundamental.

Response: Please refer to the revised test report uploaded with this response.

3. Please note that as this is a portable handheld transmitter under part 90, ERP must be measured for the fundamental. Please provide the necessary ERP of the device.

Response: Per our understanding of the FCC rules and regulations, and previous certifications, we are submitting conducted power for the power requirement per 2.1046.

4. Please report the ERP power on the 731 form.

Response: Per our understanding of the FCC rules and regulations, and previous certifications, we are submitting conducted power for the power requirement per 2.1046.

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.