



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

December 20, 2004

RE: FCC ID: OWDTR-0037-E_ATCB002019

Attention: Rick McMurray

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 occupationally source-based time-averaged values are generally done at a 50% duty cycle value. However, the manual states a 60/40% duty cycle. Please explain why the manual uses a non-standard duty cycle.
2. Please note that this device is stated in the manual as a controlled rf exposure environment. The MPE indicates that uncontrolled environment was used to produce the calculated 21cm separation. Please note that as this device is a controlled rf environment the MPE calculations for this device show a safe distance of about 8.6cm using a 2.14dBi dipole antenna. Please explain why the MPE report uses uncontrolled limits for a controlled environment device. Why was MPE measured and not simply calculated? Please report MPE using the correct rf environment limits etc. for this device.
3. Please provide a sample of your calculations for radiated spurious emissions. The numbers provided do not seem to match your provided formula for data shown on page 14 of the report. Perhaps the error is in rounding off numbers. In any event please provide a sample calculation using the provided values will clear the issue up.

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.