



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

May 31, 2007

RE: FCC ID: OWDTR-0049-E_ATCB004967

Attention: 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. FYI - Please note that verification to Class B limits is not the same as a Declaration of Conformity used for computer peripheral devices. Please also note that receivers which can normally be done under a DoC are still verified when they exist as the receiver portion of a transceiver the transmitter of which is certified. Please explain why a class B DoC label is on the device. Is this a home computer peripheral device?
2. The modulated signal in the Occupied Bandwidth plots are about 20dB down from the unmodulated carrier in the FSK 9600 and 4800 baud. 20dB generally relates to about a 10% duty cycle. While I can see 10 to 15 dB difference between the modulated and unmodulated signals, 20dB seems a bit much. If this is accurate, then it is OK, however, please verify the OBW plots and that the 20 dB down between the modulated signal and the carrier reference is accurate for the two baud rates.

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.