



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

June 2, 2007

RE: FCC ID: OWDTR-0050-E_ATCB004981

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. Please note that the latest FCC extended frequency band interpretations state, "Portion of band must not be used solely for a rule part not applied for unless justification in (e), below, applies. Consider splitting rule parts in different line items to remove ambiguity if needed.... For multiple rule part line item, tighter specs must apply where frequency ranges are common between rule parts." It goes on to say, "The filing must have a justification letter for extended frequencies outside of applied rule part. Operation must be justified under 2.807. For example, Government / Military use or exportation to other countries has been allowed. Justification letter from grantee must indicate marketing plans to ensure USA users, other than those specifically identified, cannot operate device outside bands allowed under the relevant rule parts applied for." Please provide that appropriate justification letter for the extended frequency bands for both part 90 and part 22.
2. Please note that In regards to item 1 above, while Part 90 has sufficient contiguous operating frequencies between 150 to 174MHz to warrant use of extended bands, part 22 does not. Please note that the bands for part 22, while listed in part 22 as between 152-159MHz, has areas within that band that have greater than 1MHz non-contiguous use (i.e. part 22 is not in the band between 152.855 to 157.45MHz and no Part 22 frequencies exist between 162.0125 and 174MHz). This means that you must not only separate the line items for part 22 and part 90, you must also list the particular separate part 22 frequency bands within the 152-174MHz that have greater than 1MHz non-contiguous use. Please provide a properly completed 731 with the above specific frequency bands.
3. Please note that in regards to the above items 1 and 2 above, the FCC requires that the specific rule parts be addressed. The FCC also has stated that only allowed frequencies in the specific rule part at to be tested. This means that for the part 22 bands (there appears to be at least 2 distinct part 22 bands) you must test at least one frequency in each band. Please provide test data for part 22 frequencies that use allowable frequencies.
4. Please note that the FCC test guidance for extended frequency band listing states, "Test at least one frequency, unless required to test on multiple frequencies, in each band for each rule part applied for and ensure the device is capable of operating on the frequency in each rule part. Test on one frequency may be accepted if multiple listed bands for a rule part with a continuous frequency range listing, if the listed bands are split to remove a conflict with other rules and the technical requirements in the split bands are the same. Other requirements for RF exposure may apply." Please provide power measurements in accordance with the above stated test guidance. Alternately, please justify testing of one frequency as stated in the guidance. Such justification should include justification for all bands and all rule parts
5. Please note that that the occupied bandwidth plot on page 18 of the test report states it is for 162MHz. Please note that the center frequency on the plot says 143MHz. This means the device is not compliant with the requested frequency band and rule parts. Please retest as necessary to provide data for only the bands and rule parts for which certification is being requested.
6. Please note that as of June 2 all testing for Industry Canada RSS119 must be in accordance with the latest specification. Please note that there is no grandfather or phase in period. Please review and verify that testing has been performed to rev 9 RSS119 June 2007.

Dennis Ward

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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.