



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

June 12, 2007

RE: FCC ID: P7QRM-267V\_ATCB005021

Attention: Hoosamuddin Bandukwala

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 FCC ID label is not correct. Please note that the label provided has a “/” instead of “.”. This is not a proper FCC ID label. Please note that the FCC rules specifically state the ID label is to be in the form of FCC ID:XXXXXXX. Please provide a proper ID label in accordance with the FCC rules.
2. Please note that the IC number is also incorrect. Please note that the IC states the IC label is to be in the form of IC:CN-UPN. Please note that the IC clearly states that if the device is not labeled correctly the device is not considered certified. Please provide an IC label sample that is in accordance with the Industry Canada rules and requirements.
3. Please note that the tune up procedure shows the device operates in the 1710-1784MHz range. Please note that part 27 subpart L frequencies exist from 1710-1755MHz. Please note that there is no test data and no request for certification under part 27. Please verify that the device does not operate in this frequency range in the US and please explain how this frequency band is made not operational in the US.
4. Please note that for radiated spurious emissions listings on pages 15-26 you only provide the final ERP/EIRP values. Please provide the data required including the level into the generator, the substitution antenna gain and the cable factor. If the data is derived from these factors being inserted into the analyzer please so state and please provide the sample calculations and formula used.
5. Please provide radiated spurious emissions data in the appropriate values for the specific rule parts. Please provide ERP for part 22 and EIRP for part 24.
6. Please note that as this is an original application you must provide a test report for an original application. This means you must provide a test report for both parts 22 and 24 which includes power (ERP/EIRP), occupied bandwidth, band edge, frequency stability, conducted spurious emissions as well as radiated spurious emissions as tested in accordance of the FCC rules and TIA603C. Please note that the only reports provided address radiated spurious emissions and ERP/EIRP power. Please provide the proper report data for certification of this device.
7. Please note that the cross reference to RSS210 is unacceptable as it refers to issue 5. Please note that RSS210 issue 5 has not been an acceptable test standard for Industry Canada since September 2005. Please note that all testing must be in accordance with the latest RSS210. Please retest and make sure that BT testing is in compliance with the latest RSS210 issue 7 issued in June 2007. Please then reference the correct standard and sections in the test report.
8. Please note that the device shown in the external photos does not appear to look like the device in the test setup photos for SAR. Please explain and please verify and provide evidence that this specific model device was tested for SAR.
9. FYI – Please note that this device is also a computer peripheral device. As such it must be either certified or DoC'd under 47CFR part 15B. The label does not contain the DoC FCC mark and the application does not contain application for certification under 15B. Please address the 15B aspects of this device in an appropriate manner by either applying the correct FCC DoC label or by certifying the part 15B portion of the device.

*Dennis Ward*

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.