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

June 5, 2002

RE: Eka Systems, Incorporated

FCC ID: P9X-EMS-H200

After a review of the submitted information, I have a few comments on the above referenced Application.

1) The FRN Number provided (0007-0503-05) had the following error when searched on the FCC Database: "The FRN is Inactive. Please Contact CORES administrator". Please note that we must have a valid FRN number in order to process the application. Please explain.
2) The EUT block diagram and operational description suggest that the EUT is designed for use attached to an embedded computer, while the EUT was attached to a Hub. Please explain. (also see #3 below)
3) Various exhibits mention that the device is to be attached to an embedded computer. Please comment on whether this device should also be considered as Class B or class A peripheral since it is designed with a serial interface. Please note that additional labeling information will be required for Class B DoC authorized peripherals or if the device is considered a Class A peripheral, then justification as to Class A classification should be provided.
4) Please provide a better resolution copy of the label. The wording provided on the label is not easily discernible.
5) The manual should also include the statements of 15.105. Please provide an updated manual.
6) This device utilizes a blue tooth module. We have been including the attached file with other blue tooth applications since it covers many of the regulatory requirements of 15.247 for compliance parameters that should not change for Blue Tooth devices. Please review and comment if we may include this file with your application.
7) Section 2.1033(b)(5) requires a schematic for the transmitter portion of the product. Eka Systems, Inc. may not have access to this information if the RF module is designed by a different company. Please provide either a schematic for the transmitter portion of the product, or as an alternative you may provide a parts list that specifies the module as an OEM part provided by another manufacturer.
8) The highest output power measured was 11.2 dBm, while the operational description mentions 20 dBm. Please explain this discrepancy.
9) Please confirm the instrumentation settings used during the power spectral density test.
10) Please provide a sample calculation for Section 4.5 of the test report.
11) The test procedure 4.5.1 states a resolution bandwidth of < 10 Hz for average measurements above 1 GHz. The VBW should actually be ≥ 10 Hz. Please comment on the VBW used.
12) For spurious emissions, please explain if the EUT was hop-stopped. Also please explain if the transmitter for purposes of this test set to a CW signal, or was there a duty cycle associated with the TX carrier during these tests?
13) Blue Tooth devices are classified as a hybrid spread spectrum device and require the processing gain as specified by 15.247(f). Please note that this requirement will be removed in the next few days when the Report and Order is published in the Federal Register (see http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-02-151A1.pdf).

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Examining Engineer

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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.