



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

June 24, 2006

RE: FCC ID: PDNRM-171_ATCB003623
Attention: Timo Seppala

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 ERP values stated in the RM-170 for GPRS mode and that stated in the RM-171 for GPRS mode are significantly different. The RM-170 states an ERP for part 22 as 0.49W (see page 5 of the report) while the same mode (GPRS) for the RM-171 states 1.45W. It appears that the RM-171, in spite of the justification for using RM-171 data for some of the RM-170 data, has too significant a variance. If in the GPRS mode for the device in question the power difference is a factor of 3, it seems reasonable that possibly a similar variance may exist between the GSM modes. Please provide reports either showing a more reasonable correlation in the various modes, please provide a separate test report of the GSM mode for the RM-171 or please provide justification as to why the GSM data for the RM-170 should be used for the RM-171.

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.