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18 May, 2005

RE: FCC ID: POCWLNB1_ATCB002419
Attention: Dennis Ward

In reply to your comments on this application dated 12 May, 2005

[ATCB]
1. Please note that the power level recorded on the RSP100 for is 33mW, but the value shown in the report is a conducted power of only 26mW. Please explain and please provide an RSP100 with the correct measured power.

[TUV-Greg]
I've uploaded a revised RSP100 with the correct power level of 0.0263W
"Xata IC Application-Authorization-Conf req & disclosure rev 2.pdf"

[ATCB]
2. Please provide a block diagram that meets the requirements of 2.1033. Such diagram needs to show the oscillators and signal paths of the associated transmitter device.

[TUV-Greg]
I've uploaded some new exhibits from Xata Corp. They include radio OEM documents including request for confidentiality, block diagram, and schematics.
"Xata OEM request for confidentiality.pdf"
"Xata OEM block diagram.pdf"
"Xata OEM schematics.pdf"

[ATCB]
3. In the internal photo exhibit (page 1) there appears to be copper tape. Please explain if this copper tape is used for shielding purposes and please explain if this is an engineering fix or if this is installed at the manufacturer. If this is an engineering fix, please provide an attestation from the manufacturer that this will be implemented in the final product.

[TUV-Greg]
The copper tape is installed by the manufacturer and is used for shielding.

[ATCB]
4. It is unclear from the plot data on page 45 of the report if the device is compliant to the restricted band limit of 54dBuV/m at 2390MHz. Please note that the plot does not indicate if the level on the analyzer screen is a corrected value or not. Also, the restricted band frequency of 2390MHz is not clearly marked. However, estimating where 2390MHz would be places the level for peak emissions at about -48dBm or 59dBuV/m, which may mean the device is not compliant as no average data at that frequency has been provided. Please explain and please provide compliant data for the restricted band at 2390MHz.

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[TUV-Joel]
This measurement is a close field probe measurement to demonstrate the fundamental complies with the -20 dBc criteria at the low band edge of 2400 MHz. The radiated data sheets indicate there were no radiated emissions in the restricted bands at 3 meters.

[ATCB]
5. Please note that for frequencies above 1GHz in the restricted bands there are two limits that must be met. The average limit of 54dBuV/m and the 20dB over the average limit (74dBuV/m) specified in 15.35(b). While the data on page 41 of the report shows average limit compliance for 2, 7 and 10 GHz, it does not show compliance to the peak limit, nor does it show compliance to the restricted bands in those frequencies. As there are restricted bands in all of the ranges stated, the frequency listed needs to be more accurate and definitive than 2, 7 and 10GHz. Please provide peak data showing compliance to the 20dB over the average limit as required by 15.35(b) in the restricted bands. Where the peak data is over the average limit, please provide average data as well.

[TUV-Joel]
No signals were detected in restricted bands, the levels indicated are noise floor measurements.

[ATCB]
6. Please note that as all of the recorded radiated emissions frequencies above 1GHz are exact even frequencies (i.e. exactly 2, 7 and 10 GHz), it is not clear from this data if measurement of the harmonics of the device were performed. Please verify and show evidence that the harmonic emissions of the fundamentals between 2412 and 2462MHz were investigated.

[TUV-Joel]
The data sheets state no spurious were detected all the way up to 25 ghz. This appears to agree with conducted plots, which show 4th harmonic, 9.6 ghz, but this does not fall in restricted band.

Greg Jakubowski