



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

May 22, 2002

RE: FCC ID: PVCGTP224

Attention: Jack Tsai

I have a few comments on this Application.

- 1 The Bi-log Antenna (CBL6141A from Schaffner) serial # 4206 shows that it was out of cal when the test was performed. The Antenna is listed as having to be calibrated by 03/09/02, yet the test was performed 5/14/02. Section 3.1 shows that this antenna was used for the test. Please provide a test report with properly calibrated test equipment. xx
- 2 Section 3.1 of the report says that the final radiated emissions was done in an anechoic chamber. The test setup photos and the table in section 3.4 of the report say it was done on an OATS. Please correct the report to be consistent for OATS testing. xx
- 3 Because item one is out of calibration, the following becomes a concern. The Tx chip in the device is listed as a 10mW device (10dBm). This being the case, assuming the 10mW was delivered to the antenna terminal and with a 1.26 gain antenna the dBuV level at 3 meters would be approximately 100+dBuV. The report states that the highest measured reading was 77+ dBuV at 3 meters. Please clarify the actual power rating of the chip Tx power and please verify, using calibrated antenna(s), what the field strength is at 3 meters is. This request is in conjunction with item 1 above. xx
- 4 The RF exposure calculations are used to estimate the closest range the device can operate to a person so a claim of compliance to 1.1307 can be made. The RF exposure statement you provided only uses the field strength, gain and distance to calculate the value of S. This does not provide the distance factor necessary to make a claim of categorical exclusion as specified in 1.1306. Please correct this RF exposure statement to provide the minimum distance the device is allowed to be to the person by which categorical exclusion is made. xx
- 5 Also, please note that this distance statement provided categorical exclusion needs to be in the manual. A statement similar to "The antenna used for this transmitter must be installed to provide a separation distance of at least 20 cm from all persons and must not be co-located or operating in conjunction with any other antenna or transmitter." Is sufficient. xx
- 6 Please note that since there is no request for confidentiality, no part of this application will be held confidential. If confidentiality is requested, please provide a letter requesting confidentiality under 0.457 and 0.459 of CFR47. If confidentiality is requested please specify which parts are confidential. Only schematics, theory of operations and block diagrams are typically held confidential. xx

A handwritten signature in black ink that reads "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.