



American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

July 2, 2007

RE: FCC ID: Q5EPT720002_ATCB005118

Attention: peter

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 731 is signed by Ms Cheryl Zhu. However, no indication as to who this person is has been provided and the applicant name listed on the 731 is chenxin. Please explain the relationship between Ms Cheryl Zhu and the applicant company. Please provide evidence that Ms Zhu has the authority to sign documents for the applicant.
2. Please note that while the manual states the device is not to be worn on the body, the external photos show what clearly appears to be a belt clip or belt clip holder. Please explain.
3. Please note that page 4 of the FCC test report states Power Out was tested in accordance with 90.205(h) and (g). Please note that while 90.205(h) is for the 450–470 range, 90.205(g) is for the 421–430MHz range. Please explain why 90.205(g) is used.
4. Please note that FCC listing in accordance with 2.948 do not apply to licensed devices. Please also note that no indication in the accreditation statement indicates that the lab has part 90 on its scope of accreditation. Consequently, no evidence is provided that the lab is qualified to perform testing in accordance with part 90 of the FCC rules. Please provide evidence that the lab has FCC Part 90 in its scope of accreditation from CNAL. Alternately, please show evidence that ATCB has audited the lab and has approved the lab for part 90 testing.
5. Please explain the term "Not available for this EUT" on page 7 of the FCC report. Does this mean accessories are not provided for this model or does it mean they were not accessible for test?
6. Please note that the report does not state testing was performed in accordance with TIA603C. Please confirm and verify that all testing was performed to the FCC acceptable test method TIA603C.
7. Please note that channels 1 through 8 appear to be duplicated by channels 9 through 16. Please explain.
8. Please note that the report states there are 16 channels. Please note that these channels are from 451MHz to 468MHz. Please note that the application requests the frequency band 406.1 to 470MHz. Please explain the reason for requesting the frequency range between 406.1 to 451MHz.
9. Please note that the 1kHz audio modulation plot on page 11 of the FCC test report do not look like what is normally expected in such a plots. Please explain the plot and please confirm that the modulation circuitry in the unit is operating properly.
10. Please note that page 4 of the report states mask B is used while pages 22 and 23 indicate masks B and D are used. Please explain.
11. Please note that the values given in the table on page 24 of the report do not add correctly using your formula. For example you state that a reading of -41.6dBm with a substitution antenna gain of -0.88 and a cable factor of 3.7 equals -38.8dBm. Using your formula in the report (i.e. $\text{Transmit Power(dBm)} = \text{Reading(SG)(dBm)} + \text{Antenna Gain(dBm)} - \text{Cable Loss(dB)}$) the value should be $(-41.6) + (-.88) - (3.7)$ or -46.18dBm. Please also note that the second entry, using your specified formula would yield 31.4dB and not 33.8dB; and the last entry should be $(-34.8) + (+25.1) - (-32.3)$ or +22.6dBm. This last value would be about 40dB over the limit. Please explain and please provide the correct resultant values for radiated emissions ERP data. Please ensure that all results in the radiated emissions tables within the report are corrected and verified accurate. Please show a sample formula using the entries in the table with all of the associated polarities.
12. Please also specify if the gain of the antenna mentioned is in dBi or dBd. Please remember that part 90 is an ERP measurement.

13. Please note that in the same table mentioned in item 11 you state that the cable loss has a negative factor. This would correlate to a gain. This is not possible in a cable. Please explain how a cable has gain.
14. Please note that the cable factors used in a part 90 ERP antenna substitution is typically a fairly short cable leading only from the signal generator to the antenna. Such cable at the frequency range involved would be expected to have very little loss in the order of possibly 1 to 3dB at the most. Possibly at the higher frequencies of 4Ghz the cable loss may exceed 12dB. Please note that your test data suggests the cable factor used in measurements is greater than 32dB. If this is in actuality a cable loss factor and not a gain as the sign indicates, this would be typical of a broken cable. Please explain and retest using a more adequate cable and cable factor.
15. Please note that when considering SAR as shown on page 37 of the report you must also consider EIRP values and not just conducted antenna terminal values. While the device may be under the required level on conducted antenna terminal measurements, the antenna gain of the device must be included to estimate the EIRP power. In this case, assuming the antenna gain was that of a dipole (e.g. 2.14dBi) then the power level for SAR would be about 5.5W. However, if the device is not worn on the body as mentioned in the manual, the SAR is still not required. Please confirm.
16. Please provide a more detailed explanation of the "Wired Cloning Mode" function of the device. What is the intent of the cloning mode etc.
17. Please note that the manual is for both the European version and the US version. Please confirm that the US version cannot be made to operate on non-US frequencies.



Dennis Ward
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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.