



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

November 18, 2002

RE: FITRIGHT Industrial Co., Ltd.

FCC ID: QJIFR-CH0002

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

- 1) Your response to question 5 suggests that the spurious data is from the earlier results but the new fundamental field strength is from the unit B. Although a slight variance may be expected between units, a 30 dB variance of the fundamental suggests a problem either with the units or the testing. This problem must be resolved, and the test report corrected for whichever power is the actual worse case power. Currently the worse case fundamental data appears to be in the spurious emissions tables. Please note that permissive change applications expect power variations of no more than ± 3 dB. A 30 dB variance is not acceptable.
- 2) In order to utilize a 10 Hz RBW for an average measurement, the TX must be set to a CW output without a duty cycle. From the measurements provided (high peak to average values, given a 1 MHz bandwidth), it appears that the device may not have actually been tested for spurious average measurements with the TX set to a CW output. Note that the recent results of peak and average fundamental field strength are almost identical, while the spurious emissions appear to vary dramatically. Please provide either:
 - a) Confirmation that the device was tested with a CW output, or
 - b) If the device was not tested with a CW output, then provide worse case dwell time per channel information so that averaging for duty cycle can be calculated. This is usually sufficient correction for this type of TX in order to meet the average limit.

Timothy R. Johnson
Examining Engineer

[mailto: tjohnson@AmericanTCB.com](mailto:tjohnson@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.