

November 18, 2002

RE : FITRIGHT Industrial Co., Ltd.
FCC ID : QJIFR-CH0001

Dear Tim:

After the review of your comments, we have made some response upon your advice; they are summarized as follows:

1. The new label of the headset is uploaded. Please find it as an exhibit uploaded.
2. The new schematic of the handset is uploaded. Please find it as an exhibit uploaded.
3. Regarding to your comments, we have performed the testes again and found that the results seem corrected but have been put into incorrect column. Please refer to the one attached.
4. We have 2 samples from the FITRIGHT given. Most data are measured by the Sample #A in the past, as the recalling for the testes about the 15.249 is launched recently, we have do some additional testes as shown on the <field strength> and <bandwidth> etc. with the Sample #B as Sample #A doesn't work anymore in our recent testes. This is the reason why the data seems not match each other. But in our testes ensure that both samples are complied with the rules whatever they seem slightly different each other.
5. In section 6.4, you may find no correction factor (for the freq. >3.5GHz) in the table. As I have explained before, the spectrum analyzer we'd used from the HP is the one so-called "total-solution", none correct factors is taken into account as they're built-in. The corrected amplitude will be displayed directly so none correction factor to be counted.
6. As the test condition (Sect.6.1) stated, we have applied the VBW=10Hz is to be considered enough to "capture" the emission so we haven't applied the duty cycle correction to measuring the average measurement. FYI.

(See also in next page)

7. Firstly, the FITRIGHT doesn't make any changes or modifications to bring the device to comply the 15.249. We have applied the 15.247 at the beginning is based hopping properties of the device, but it is suspended in sometime as the power issue makes it need the SAR evaluation. After the conversation between our manager and William at your side, they conclude that the device can be approved under the 15.249 as it's power is not exceeded the threshold of 15.249's but it bear no SAR limitation. Then we re-do some testes and re-submit the materials as uploaded recently. It is already complies with both 15.247 and 15.249, none changes or modification is bought to comply instead.

Should you have any questions or more information is requested, please don't hesitate to ask us.
Thank you.

Sincerely yours,
Eric Wong
Project Engineer
Training Research Co Ltd.