



October 20, 2005

RE: FCC ID: QMNRM-121\_ATCB002821

Attention: Louis Le

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 radiated spurious emissions data on page 27 of the report includes a "correction factor" but does not state what this correction factor is. ERP values are generally obtained by simply adding the gain of the antenna to the signal generator level as measured and subtracting the cable. As the gain of the substitution antenna is given in the table, and as it is unlikely that the cable has such a high attenuation it is not known what this correction factor means. Please note that this is further confused by the explanation of radiated emissions as detailed on page 38 of the report. Please note that as this is a licensed device ERP values must be measured for any signal within 20dB of the limit and not referenced to a calculated e field using reverse calculation ( i.e you cannot use  $(E_d)^2 / 30G$  for justification of ERP limit comparison). While this method may be considered for those signals that are more than 20dB from the limit, it cannot be used to estimate or derive ERP compliance for a licensed device for signals within 20dB of the limit. Please note that, other than a reference to a "substation antenna" on page 27, the report does not indicate that proper erp measurements in accordance with TIA603 have been followed for radiated spurious emissions. Please explain.
2. Please note that on page 35 of the report you state, "The resulting erp is the signal level fed to the reference antenna corrected for gain referenced to a dipole." However, on page 32 of the report you include a 'correction factor'. Please explain what the correction factor column on page 32 of the report entails. Please show a sample calculation of this correction factor and how it is derived.
3. Please explain why section 2.2.12 (radiated spurious emissions) of TIA 603 was used for Power measurements and why the correct section 2.2.17 was not used.
4. Please explain why the detector function for ERP power on page 32 of the report is set to channel power. It should be estimated that with the reported conducted power of the device on page 31 an estimated antenna gain of the device as 0dBd that the ERP of the device would exceed 200mw. Please explain.
- 5.

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.