



American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

August 16, 2006

RE: FCC ID: QMNRM-155_ATCB003866

Attention: Ron Chernus

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 FCC has stated that the policy for testing devices with both T-Coil and M ratings is as follows, "Both RF emission rating and T-coil rating must use the same version of the standard." Please note that the RF emissions (M rating) for this device appears to have been done using the 2005 C63.19 draft version 3.6. However, the accepted T-Coil test method allowed by TCBs is ANSI C63.19-2006. Please note that while the two standards may be very similar, they are not the same version and thus do not strictly meet the FCC requirements stated above. Please address the requirement of RF emissions and T-coil testing being done using the same version of the standard. Please note this may involve retesting or otherwise showing compliance to the M ratings under the new standard version. Please retest as necessary.
2. Please note that ANSI C63.19 2006 appendix C5.1 calls out for a probe linearity check of the probe as well as the sensitivity verification. This is done at the time of test as verification. The report does not appear to show the linearity verification per this section of the standard. Please explain and/or please provide as necessary. If the data is in the report, please specify the page (please note this is not the linearity data found in the calibration certificate).
3. Please note that except for the term ABM1, the data listed in the table on page 19 of the report has not units. Consequently, it is not known what the numbers mean. Please note that assumptions cannot be made. Please specify in what units the data is given (i.e. ABM1 is clearly identified as dBA/m; is this also the unit for ABM2?). Please clearly identify all data units.
4. Please provide information on any user controllable frequency response functions that may exist.
5. Please note that typical base station simulators may require special vocoder calibration. Consequently the FCC has stated "Calibration details and related calculations should be clear and correct." Please address the base station vocoder calibration issues.
6. Please note that the FCC has stated, "The RF emission measurement plots centered on the T-coil axial location should be provided along with the RF emission T (RT) category." While rf emissions information on the affects to T-coil measurements is provided in the report, there is no plot of this rf emissions data as related or centered on the T-coil axial location. Please explain and/or provide these plots or please explain why these plots have not been provided. If this data is in the report please specify the page.
7. Please provide the manual showing the associated T-coil HAC information (i.e. rating etc).

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.