



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

December 26, 2007

RE: FCC ID: QMNRM-347_ATCB005757

Attention: Stephen Walmsley

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 testing for FCC certification through a TCB must be done using an FCC accepted procedure. Please note that TIA603 is the accepted test procedure for licensed devices. Please note that the "SAR Measurement Procedures for 3G Devices" is not acceptable for EMC test methods. Please explain why "SAR Measurement Procedures for 3G Devices" is listed as used on page 6 of the EMC test report and please retest using the appropriate test methods for EMC.
2. Please note that the effective radiated power out in the emissions table only show the reference level and final erp/eirp. Please provide the formula used to obtain the power and please provide the readings involved (i.e. signal generator level to antenna, gain of antenna, cable factor etc).
3. Please note that the plot on page 44 of the EMC test report (849MHz band edge) appears to show a failure. Please note that the center line is marked as 849MHz (i.e. the band edge). Please note that when zooming in on the band edge on that page the emissions (blue line) appears to be over the -13dBm display line (i.e. the reading was taken at the bottom of the line segment instead of the top as required. Please explain and/or retest to show compliance to the band edge requirements.
4. Please note that while erp values between the SAR and EMC report can be up to 3dB, when conducted power is used the differences between the SAR and EMC reports can only be 0.5dB. Please note that the readings on page 40 of the EMC report state that channel 777 highest power was measured at 25.32dBm. Please note that page 16 of the SAR report states that channel 777 highest power is 26.29dBm. Please note that this is a 0.97dB difference. Please also note that the SAR report states that SO55/RC3 was used as the worse case. The power in the EMC report for this mode is listed as 24.52dBm but the highest SAR power for this mode is listed as 26.29dBm. The difference in this case is greater than 1.5dB. Please also note that similar differences exist in the PCS bands. Please explain and please provide data within the 0.5dBm allowed by the FCC.
5. Please note that the same or similar conducted power level problem appears to exist with the HAC reports as well. Please explain.
6. Please note that the 15C test report states that testing was performed in accordance with ANSI C63.4. Please note that as this is a BT transmitter under 15.247, except for set up, ANSI C63.4 is not the appropriate test procedure. Please note that testing for TCB certification must be done to acceptable and approved test procedures. For FHSS devices such as BT this would be DA00705. Please provide test data clearly showing test performed to the proper and accepted test methods. Please clearly identify the proper test methods used for compliance testing.

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.