



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

March 25, 2004

RE: FCC ID: QURNHL-12_ATCB001214

Attention: Esa Hakala

I have a few comments on this Application.

1. Please note that some of the ERP calculations on pages 8 and 9 of the part 22 report do not appear to add up according to your formula and numbers provided ("831_Exhibit06a_01.pdf"). For example, your formula states $(P_{\text{subst_tx[dbm]}} + (P_{\text{EUT[dbm]}} - P_{\text{subst_rx[dbm]}}) + G_{\text{substitute_antenna[db]}} - L_{\text{cable[dbm]}})$. For the first calculation this would be $(10 + (-9.17 - -30.94) + -0.95 - 4.02) = 26.8\text{dbm}$ not 27.5dBm. Please check the calculations for channels 128 and 251 on pages 8 and 9 of the associated report. Please explain and or recalculate your ERP values according to the formula provided. Please note that recalculation may also affect the power listed on the SAR report and 731 provided.
2. FYI – please note that there is no rule part 22.917e. 22.917 was changed last year and has only a, b, c and d subparagraphs. The limits were also changed to $43+10\log P$ (-13dBm) as stated in 22.917(a). Please correct future reports to refer to the appropriate rule part subparagraphs.
3. Please note that the reported ERP on page 16 of the SAR report is 30.48dBm for channel 128 and 29.63dBm for channel 251. Please note that these are the same values from the EMC report which has an apparent calculation error as stated in item 1 above. This appears then not to be a measured ERP during SAR testing but a carry over from the EMC report. Please explain and or correct as necessary (i.e. as the EMC and SAR testing do not appear to have been done at the same physical address, please verify that the SAR power level was at maximum and that no damage or other problems with the transport of the EUT occurred which might have affected measurement results).

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.