June 8, 2005

RE: FCC ID: QVVRM-109_ATCB002477
Attention: Robert Binder

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 operational description states that this device is both GSM and WCDMA. It appears that only the 300KGXW and the 300KG7W are appropriate for the US. However, the 731 mentions 1930.2 to 1989.8MHz band. Is this in error? Please explain.
2. Please note that while the first plot on page 7 of the BT report matches the data in the table on page 6 of the report, the other plots on pages 7 and 8 do not. Please note that the headings on these other plots say the resolution bandwidth is 1MHz, however, the plots themselves show a resolution bandwidth of 10kHz. Are the other 2 data in the table on page 6 from plots that were not included? Please explain the discrepancy between the plots and table data.
3. FYI – no action needed. Please note that you have only reported the smallest dwell time. Please note that the highest dwell time for a BT device is typically around 250 to 300+ ms. Please report the highest dwell time in future reports.
4. FYI - Please note that the 20 dB bandwidth reported in the test report is not in accordance with the specified IC bandwidth measurement procedure. Please note that the IC procedure sets the reference level to that found in the peak power measurement procedure and then sets the resolution bandwidth to approximately 1% of the device bandwidth. The 20dB bandwidth is then taken from the reference level 20dB down. This then is the IC 20dB bandwidth. This required IC test method can be found at the following website - http://strategis.ic.gc.ca/epic/internet/inceb-bhst.nsf/vwapj/OCC_BW_E.pdf/$FILE/OCC_BW_E.pdf. In the future, please use this method for measuring IC 20dB or 99% bandwidth.
5. FYI – no action needed. Please note that while reference to the substitution method is good, the report should have the actual description of how the substitution method was performed.
6. Please provide the calibration data for the probe and validation dipole used in the SAR test.
7. Please provide the English version of the manual.

Dennis Ward

Dennis Ward
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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.