



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

May 1, 2003

RE: FCC ID: QWLM105
Attention: Jon Hughes

I have a few comments on this Application.

1. You have not provided the tune up procedure for this application. Even though the end user cannot 'tune' the device, the FCC requires that all licensed devices provide the factory tune up procedure in the application. Please provide the factory tune up procedure for this device.
2. FYI – Since the device is to obtain its own ID number, there is no need to put the "Contains TX FCC ID:xxxx" on the label. This would be needed if the EUT were going to rely on the FCC ID of the modem itself and not obtain its own ID. Also, please note that the original grant and PC2 for the FCC ID:NBZNRM-6832 specifically restricts the use of the modem to mobile devices or devices used solely in mobile configurations. This application shows the device used in a body worn configuration. This voids the grant on the modem consequently making it improper to place the "Contains TX FCC ID:xxx" on the device. (i.e. referring to a device that is not granted for the purpose used.)
3. FYI – no action needed. Your EMC report refers to a section in 22.917 that no longer exists (see page 4 of the EMC report). Part 22.917 has changed and the paragraph numbering is different. Please review the latest Part 22 as of Feb 18, 2003 for reference.
4. The original report for the modem showed the proper frequencies of 824.04 and 848.97 allowing compliance at 824 and 849. Please look at your band edge compliance data shown on the OBW plots. While your report states that the device operates at 824.04 MH and 848.97 MHz for the radiated spurious emissions, the plots suggest that the device is apparently operating on the band edges. Please confirm band edge compliance of the device. (i.e. you may want to show band edge compliance using the reduced 1% of OBW in 22.917(b). Alternately, provide evidence from the original filing that the device is compliant at the band edges).

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.