

June 22, 2006.

Label location justification of fulfilling 2.925(d)

FCC ID: RAQT31XX

UPCS Handset as per FCC Part 15 Subpart D

Request is hereby submitted by **Giant Telecom Ltd.** to request an alternative method of positively identifying the equipment, pursuant to 47 CFR § 2.925(f) of the FCC Rules.

The FCC Identifier is not desirable to be shown on the outside of the equipment enclosure because of a consideration of its industrial design. The FCC Identifier will be permanently affixed on the battery compartment instead of the enclosure outside as shown in attachment of the label location drawing. It can be readily visible to the purchaser at the time of purchase because battery cover and battery are packed separately and fulfils the requirement of 2.925(d). It is also be visible at the time during installation.

The user manual has already included the FCC statements, pursuant to 47 CFR § 15.19(a)(3), 15.21 and 15.105(b).

If you have questions or need further information, please contact the undersigned.

Sincerely,

Mr. Eddie Lau RF Manager

Giant Telecom Ltd.

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