



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

November 11, 2003

RE: Luna iMonitoring

FCC ID: RIM-ICCU

I have a few comments on the above referenced Application.

- 1) Please provide photographs to show the placement of the part 25 Module, as well as top/bottom photographs of this module (with and without shields).
- 2) The users manual mentions that the device is field programmable and upgradeable, while a cover letter mentions only professional installation. Who has access to the software for the device. The software for connection to the device appears to show adjustment for various TX power levels and AMP power modes (page 27). Page 28 of the users manual also shows a test mode that allows the device to be hop-stopped. The end user should not have access to such control of the device (15.15(b)). Please explain.
- 3) Please explain the derivation of limits 95.9, 78.7, 97.1, 82.2, 96.2, 80.4 given in tables 9-2 through 9-4. These do not appear to be based on the results of the fundamental - 20 dB from section 6 of the report
- 4) The levels in 6 of the report do not appear to correlate to the power reported for this device. Please explain.
- 5) The users manual (page 49) mentions an output power of 17.4 dBm nominal, while the maximum power tested was 17.0 dBm. Note that the preferred method for measurement of this signal would be a Spectrum analyzer with VBW  $\geq$  RBW  $\geq$  20 dB bandwidth (prefer RBW = 1 MHz or greater). Please explain and/or correct affected exhibits.
- 6) The results of 4639 MHz given in Table 9-4 do fall in a restricted band and are subject to the limits of 54 dBuV/m. Please correct.
- 7) For purposes of Average measurements in section 9.3, please verify that the carrier was hop stopped and non-pulsing during these tests. If the device was not appropriately hop stopped with a non-pulsing carrier, then the use of the AVG detector using standard RBW = 1 MHz and VBW = 10 Hz may not be allowed.
- 8) Please explain compliance of the EUT to 15.247(g)/(h) and 2.1033(b)(10).
- 9) There have been multiple changes to part 25 recently. It may be possible that the TX may now be required to be Certified. We are investigating these changes and will let you know what we determine as soon as we can.

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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.