



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

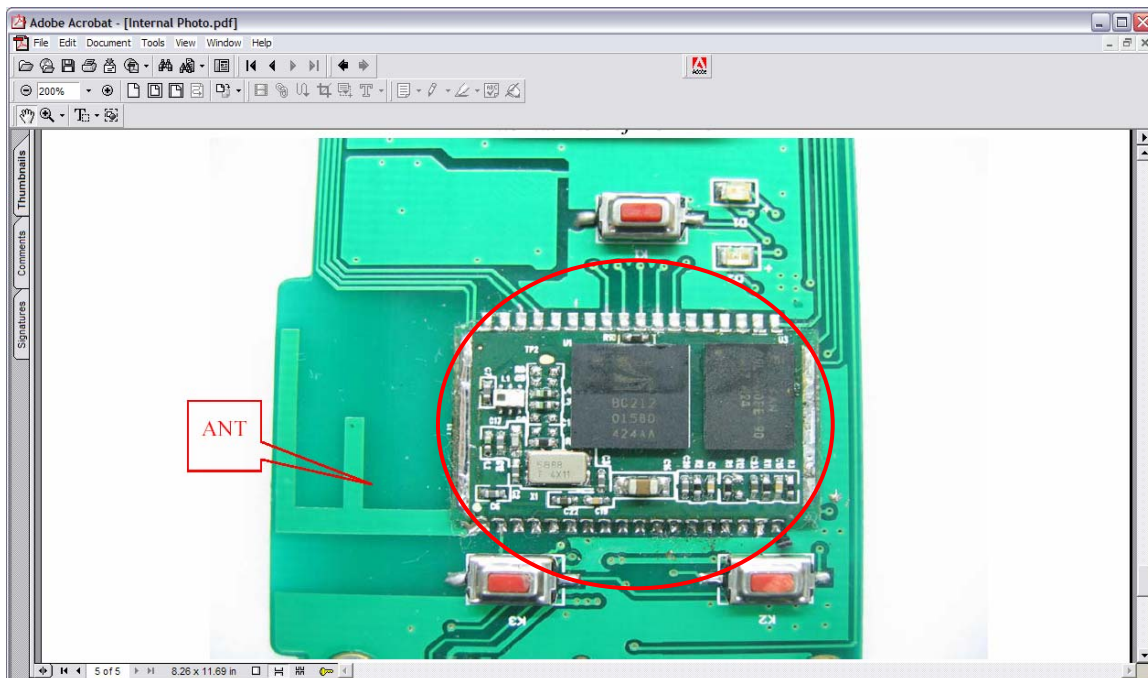
June 22, 2005

RE: CANHOLD INTERNATIONAL LIMITED

FCC ID: RRSBTHF009

After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) Please provide bottom view of the RF module/board shown:



- 2) Please provide an actual sample label. The label that can be seen in the photograph showing label location appears much different than the "Word Generated" version provided for a sample label. They each contain different information. The FCC desires an actual photograph or similar documentation (engineering drawing, CAD layout, etc.) showing the final label should be provided. Additionally, the photograph appears to show an FCC logo on the label. At first impression, this device should not require the FCC logo, which is reserved for certain DoC approvals (note that Receivers as part of a transceiver are subject to Verification). If this is present on the label, it will require justification for its use.
- 3) The schematics do not include the TX. Note that a schematic for the TX portion of the device is required as specified 2.1033(b)(5) for the RF section. Please provide either a schematic for the TX card or as an alternative, you may provide a parts list that lists that shows that this part is provided by another manufacturer (the parts list should show the manufacturers name as well). Please provide either a schematic or parts list as specified. If necessary, please update the confidentiality letter to include the parts list.

- 4) This unit is clearly designed for car, portable, and office use and not necessarily restricted to vehicle use based upon its design. Additionally, the device incorporates a standard type of AC/DC adapter connector and appears to be able to be used with a standard AC/DC adapter. This is also supported given information in the users manual as it discusses an AC adapter and also office use. Therefore AC Power Line Conducted emissions with an off the shelf unit or a unit intended by the manufacturer to be for this use should be performed and not considered as N/A.

Note that Section 15.207(c) REQUIRES AC line conducted test data to be submitted unless the device is strictly battery-powered. The last sentence of this regulation states that devices that include, or make provisions for, the use of battery chargers which permit operating while charging, AC adapters or battery eliminators or that connect to the AC power lines indirectly, obtaining their power through another device which is connected to the AC power lines, shall be tested to demonstrate compliance with the conducted limits.

- 5) It appears that extensive modifications were required to meet FCC regulations . Please explain how the modifications made to this unit will be implemented in production. There is concern about how well a manufactured unit will duplicate the test sample due to the nature of the modifications. Please provide the following:
  - a) detailed explanation of how the modifications will be implemented into manufactured units such that the modifications will be equivalent to the ones shown
  - b) information/specifications of the material used for the modifications
  - c) If the manufactured units will be implemented differently than the modifications shown in the application, then a Permissive Change (Class 1 or 2 depending on the results obtained from the data) should be performed on a production equivalent unit. Please confirm that the manufacturer is aware of this fact.
- 6) The test photographs appear to show the device lying down. However, expected use appears to be lying down or standing up and both positions should have been tested in effort to obtain worse case radiated results. Was this performed?
- 7) Please explain why plots on pages 26-28 shows higher emissions than the tabular data. Note that additionally the plots are actually taken using a lower RBW setting than the tabular data. Additionally, please explain why emissions for high channel at 2.240 and 7.43 GHz are over the 54 dBuV/m limit, but neither appear to be measured for radiated emissions. Please note that spurious emissions are any emissions (harmonics, modulation by-products, intermodulation, or other emissions) that occur from activation of the Transmitter, not just the harmonics.
- 8) One of the readings on page 36 & 37 of the test report shows an average measurement. However, compliance for peak measurements must also be shown.
- 9) FYI...Section 1.2 of the report regarding the receiver is incorrectly stated. Receivers as part of a transceiver as stated in 15.101(b) are subject to Verification requirements, not DoC.



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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.