



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

January 15, 2007

RE: FCC ID: RTW8122_ATCB004441

Attention: Stephen Guo

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 internal photos show what appears to be plug-in crystal capability even though the tune up procedure says tuning is done via a "TX module". Please note that the schematics also show a crystal possibly as the only replacement component. It also appears that the crystal plug-in is fully accessible by the end user by using common everyday tools. Please note that Part 95 clearly states that **"Plug-in crystals are not considered modules and must not be accessible to the user."** If the TX modules are in fact a "plug-in frequency determining modules", please provide a photo of the TX module. If these are not "plug-in frequency determining modules" where each module contains **all of the frequency determining circuitry including the oscillator**, please show how this plug-in crystal capability is made completely inaccessible to the user, or please verify how the crystal is soldered or otherwise made to be permanent.
2. Please note that if the fundamental is in fact determined by the use of a TX module in which each module contains all of the frequency determining circuitry including the oscillator, please provide test data for each module as required by Part 95.645(b).
3. If the requirements of item 2 are met, please provide a photo of the TX module.
4. Please note that the internal photos do not appear to be the top and bottom of the same board. Please show top and bottom photos of all boards in the device. Please identify the location of Q3, Q5 and Q6 in the photos.
5. In relation to items 1, 2, 3 and 4 please explain how this device meets the requirements of 95.645
6. If this is a digital device please use the correct part 15 notices and cautions. If not, please explain why the 2-condition statement has been changed to state part 95 and please explain why it is placed on the device.
7. Please note that the power limits for part 95 R/C devices is not an ERP or EIRP limit. Please explain how the erp measurements performed meet the transmitter output power requirements of 96.639(b). Please provide the conducted power levels at the antenna terminal for this device.
8. Please explain why ANSI C63.4 test methods were used for the Part 95 licensed device service.
9. Please note that your test report states that you used 47CFR95 (2002). Please note that you MUST use the most recent CFR rule parts. Please recheck and verify that all testing is in complete agreement and accordance with the latest Part 95 as of the date tested (Jan 2007).
10. Please note that depending on the response to the above comments further comments may result.

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.