



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

December 5, 2006

RE: SAN JOSE NAVIGATION, INC.

FCC ID: RUU-GC1010611

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

- 1) This device is not a "cellphone" by definition. Given the label is underneath the battery, per recent FCC Procedures, the following must be provided to ATCB:

Labeling

Non-routine label proposals such as placing the label in the battery compartment must be approved on a case by case basis. For each proposal, provide justification such as limited space, how the FCC identifier or label will be viewable and how pertinent rule parts such as 2.925(d) (readily visible at the time of purchase) will be complied with.

TCB's must use the "Permit but ask" procedure and submit proposals to the KDB.

Please provide photos and a grantee signed proposal.

Note that this fact must be resolved between the TCB and FCC under the permit but ask procedure before a grant can be issued.

- 2) Current labeling does not contain proper FCC ID Information. Please correct.
- 3) Theory from Siemens, Tune up procedure from Sporton's upload, and the users manual appear to suggest 850 MHz use as well. However other parts of the application only support 1900 MHz. Please explain/correct as necessary.
- 4) Users manual does not appear to contain appropriate RF exposure information to the user. Please correct.
- 5) The schematics provided from Sporton's upload are not sufficient resolution to be easily readable. Please update/correct as necessary.

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Examining Engineer

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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.