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

January 17, 2004

RE: FCC ID: RM8AMOIA90_ATCB001046
Attention: Lou Feudi
I have a few comments on this Application.

1. Please note that the equipment code PUE is for a part 101 unlicensed device. This device is a Part 24 device. Please correct the 731 to provide the proper equipment code (PCE).
2. Please provide a 731 form that give the EIRP power, frequency tolerance and emissions designator of this device.
3. Please note that the max conducted power in the EMC report is 28.02dBm while the maximum conducted power in the SAR report is 29.18dBm. Please note that this is a difference of more than 1 dB. If this were EIRP values the difference would be acceptable. However, since they are conducted powers, the FCC requires that the values between the EMC and SAR report be within 5%. Please explain why the EMC and SAR conducted power levels are about 25% different. Please correct as necessary.
4. Please note that once the initial device level and the substitution antenna level have been correlated, TIA603 EIRP calculation consists only of adding the measured signal generator output and the substitution antenna gain and then subtracting the cable loss giving a TIA603 EIRP value of 27.03dBm. As they have no appropriate place in the EIRP calculation, please explain why you included the other two values. Was this to correct for minor variations in the two initially measured values?
5. Please note that the OBW plots do not appear the same as an expected GSM signal. The OBW plots show an unexpected 'spike' that is 10dB higher than the rest of the signal. Please explain this spike.
6. Please note that the manual states GSM900 and GSM1800 use. Please note that these are EU frequencies and not US frequencies. Please provide a manual with reference to US frequencies. Also, does this device also operate on EU frequencies?
7. Please note that the manual provides no rf exposure information. Please provide a manual with all of the appropriate FCC information.
8. Please note that the schematics are unreadable. Please provide readable schematics for this device.
9. Please provide an operational description of the phone. You have only provided a theory of operation for the antenna.
10. Please provide the parts list and the factory tune up procedure for this device. Please note that if you want these held confidential, you will have to include them in the confidentiality request letter.
11. Please note that external and internal photos cannot be held confidential. Please provide a confidentiality request that only requests confidentiality for those items that can be held confidential. These include – Parts list, operational descriptions, schematics, Block diagrams and tune up procedures.
12. Please explain how the FCC ID label is permanently affixed to the device.

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.