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

May 3, 2006

RE: CEC Wireless R&D Ltd.

FCC ID: RXSCT5888

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

1.) The Form 731 does not contain required information. Please provide (at minimum) a technical contact for line 2(a), and equipment specifications line 5.
2.) The confidential request letter should be addressed to FCC, not specifically ATCB. In addition, the confidential request letter asks for withholding the internal photographs from public view. This is not permitted. In addition, common files such as parts list and tune up procedure are allowed to remain without confidentiality. Please review and reconsider.
3.) FYI: If Short Term Confidentiality is desired, please contact ATCB with specific details. STC may be tricky, and we must plan for it accordingly.
4.) The 15.19(a)(3) statement appears to be missing. It must either appear on the Label (preferred) or within the Manual. Kindly review.
5.) This device is capable of connecting directly to a computer via a USB cable. This means an additional equipment authorization procedure is required when this device is considered a "computer peripheral". This means either DofC or Certification to Part 15B is required. If DofC then the FCC logo must appear on the label and this device must be tested at a US recognized and accredited laboratory. Kindly review with your client.
6.) FYI: In the future, a clearer copy of the Block Diagram would be appreciated.
7.) FYI: In the future, a clearer set of External Photographs would be welcome.
8.) All Part 22/24 mobile phones with non-detachable antennas must have their rated RF power listed in terms of radiated values. For Part 22, all radiated power should be in terms of dipole equivalent power (ERP). For Part 24, all radiated power should be in terms of isotropic power (EIRP). Typically the FCC requires, according to Knowledge Base index 442401, that an "independent calibration substitution methods must be done". This is often interpreted to mean that the calibration field to determine radiated power should be done at frequent intervals, and some argue that it should be done the day of the test. "Pre-calibration", as expressed in Section 9.2 of the Test Report, is not sufficiently explained.
9.) FYI: The Block Edge test results in Section 5.5 and 8.5 appear unclear. It would be helpful if a smaller span was used and a limit line of -13dBm was shown.
10.) Using the Internal Photographs, the antenna appears to align along a horizontal direction at the upper edge of the flip phone when used in a "normal" position. But using your Test Setup Photo (RSE) and the description in the Test Report [Section 9.2 (d)] the test procedure where only the vertical polarization at a fixed height may not produce the highest radiated power. Kindly recheck your results. If I have made any misjudgment about your procedure or the antenna position inside the phone, my apologies. FYI: I suggest that the height of the antenna be varied to assure that the highest radiated values are observed.
11.) FYI: When doing AC Conducted Emissions, FCC and ANSI C63.4 do not recognize the use of an extension cord or strip outlet in series with the LISN (Test Setup Photo CE and RE). Only AC powerline emissions where the wall mounted supply is plugged directly into the LISN is recognized.
12.) The DofC letter on page 100 of the Manual is very difficult to read. Could you kindly provide a clear copy of this document?
13.) The AC charger shown in the External Photos does not appear to be set up for 120Vac. Please confirm the AC conducted emissions test was performed at 120Vac

14.) Please provide a manufacturing tolerance for the target values shown in the Tune Up procedure.
15.) Please provide a Z-axis plot as the probe is drawn away perpendicular from the hot spot in the phantom. This plot is required by FCC for the highest SAR plot for head and for body.
16.) There are no dipole validation plots associated with section 4.2.5 for either head or body. These validation tests must be performed on the same day as the final SAR tests. Kindly provide this data.
17.) The manual on page 49 appears to indicate this device is capable of GPRS operations. In most cases, all body SAR measurements are expected to utilize GPRS with at least a 1:4 duty cycle during testing. Please review.
18.) RF conducted power measurements are absent from this SAR report. In general, it is recommended that conducted power measurements be performed at the beginning of SAR testing to confirm that RF power duplicates that found in the Test Report.
19.) Kindly indicate where I can find the voltage and current through the final amplifying circuit as required by 2.1033(c)(8).
20.) An attestation letter indicating knowledge that this device contains GSM and DCS frequency bands not operational in USA or it's territories is required.

William H. Graff
President and Director of Engineering

mailto: whgraff@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.