



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

May 23, 2006

RE: CEC Wireless R&D Ltd.

FCC ID: RXSCT5888

I have a few additional comments on this Application. I appreciate the work you have performed and commend you on the thoroughness of your written responses. However, there are some still some areas that need additional clarification.

- 1.) Kindly note that for all hand held mobile phones, RF power on Form 731 must always be expressed in terms of radiated units. For 850MHz Part 22 the units are in terms of ERP, and for 1900 MHz Part 24 the applicable units are in terms of EIRP. Please note I will revise this application form.
- 2.) Could you please indicate the page number in the manual where I may find the 15.19(a)(3) statement?
- 3.) Please upload your Part 15B test report.
- 4.) The FCC gives very little leeway to TCBs in accepting alternative test procedures for radiated emissions. The only document FCC recognizes is EIA/TIA 603. Consequently, this is the only procedure that I am permitted to use. For spurious emissions, I agree that using the substitution method is very time consuming, but it is a rule that must be followed. However, in practice the Commission will permit radiated field strength measurements to be substituted for any emissions which are 20 dB or more below the limit. If you choose to use this alternative procedure be sure that your test report clearly states this procedure as long as the final reported emissions are in terms of ERP/EIRP.
- 5.) With regard to the z-axis plot for SAR testing, the Commission insists upon having this illustration at the highest SAR positions for both head and body, and at 850 and 1900 MHz (when applicable). This serves as a double-check to insure that there are no RF reflections inside the phantom. I acknowledge that this can be difficult, but the Commission has been consistent throughout the years on this issue. Kindly review and provide this information at your earliest convenience.
- 6.) The tune-up procedure supplied shows a tolerance for PCS 1900 of +/- 3dB. Is this correct? FCC interpretations suggest that all testing for EMC and SAR should be at the upper power tune-up range for all testing. Based upon this information I question the reported maximum conducted power. The RF conducted power values listed in section 7.2 of the SAR report are significantly on the low side of that quoted in the tune up procedure. Also the RF power quoted in the test report section 6.5 is shown as over 30dBm. Agreement between the SAR report, EMC report and tune up procedure must be within 5% [.3dB]. In no case can the conducted RF power shown in the test report be higher than that shown in the SAR report.

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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.