



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

June 14, 2005

RE: PC Worth Int'l Co, Ltd.

FCC ID: SBCMP3200

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

- 1) The block diagram should show the frequencies of all oscillators in the TX device (CFR 2.1033(a)(5)), unless this portion of the device is an OEM part from a different manufacturer. Please provide either the block diagram for the TX portion, or alternatively provide a parts list that shows that this part is provided by another manufacturer. Please update the list of confidential exhibits if necessary.
- 2) The schematics do not include the TX. Note that a schematic for the TX portion of the device is required as specified 2.1033(b)(5) for the RF section. Please provide either a schematic for the TX card or as an alternative, you may provide a parts list that lists that shows that this part is provided by another manufacturer. Please provide either a schematic or parts list as specified. If necessary, please update the confidentiality letter to include the parts list.
- 3) For AC power line emissions tests, the power supply cable does not appear to be bundled as specified in ANSI C63.4. Please review and correct/retest as necessary.
- 4) Devices under 15.247 are subject to RF exposure requirements. Even though the EIRP of this device is < 24 mW, it would still be recommended to provide an appropriate RF exposure for this application. I have provided a sample (see attachment) that shows a good example on how to handle for these types of devices.
- 5) This device contains and RS-232 interface and is also considered a PC peripheral device (in addition to the TX requirements, i.e. Part 15 for Bluetooth, etc.) and is subject to either a Certification or DoC as a PC peripheral. Therefore the application must clarify if you are asking for:

- a) Certification of the device as a TX, and a DoC has been performed by an appropriately accredited test lab for a PC peripheral
- b) Certification as a TX + PC peripheral.

Note 1: The option b) would be considered as a composite application and 2 certificates (one for the TX, one for the PC peripheral portion) would be issued. Note that there are additional review costs associated with this additional certification.

Note 2: To qualify to perform DoC applications, the test lab must be accredited (i.e. NVLAP or A2LA) to perform testing under the DoC procedure.

Note 3: Note that for DoC tests, the device is configured with a minimum test configuration as specified by ANSI C63.4 which includes complete computer + 2 I/O devices attached (one may be the EUT) during this particular test..

Note 4: Each path (DoC or Certification) has particular labeling requirements that must be followed. For DoC authorizations, the label should also include specific DoC labeling information and also the users manual should include information regarding Part 2.1077. If the device is Certified, the FCC ID and current labeling requirements for the TX will cover the labeling requirements. However, additional grants are generated and review

costs are higher. Currently labeling and users manual do not support a DoC Authorization.

The manufacturer does have a choice of DoC or Certification, however the device labeling must match the appropriate methods used.

- 6) Please explain the use of 2, 4, and 6 in the calculations of section 12.3. It is thought this should be 1, 3, and 5. Please see attached theory.



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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.