



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

June 16, 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 parts list does not appear to show the RF module utilized in the device, however the Bluetooth module information also uploaded is assumed to be the RF module utilized and manufactured by CC&C. If the module information provided is for the correct module, there are concerns regarding the Antenna gain and output power shown in the specification. The maximum antenna gain reported in the application is 3 dBi, while the antenna given in the specification is 2 dBi. The maximum output power measured was 6.1 dBm, while the specification shows 13 dBm. Please explain and help resolve these discrepancies. There is a concern that either the incorrect specification was provided, or that the device may not have been operating under maximum output power conditions during testing which would require retesting. Please review.
- 2) The updated MPE information in the report cites 20 cm as a estimation distance. Note that due to the use of this device, 20 cm can not be assumed. Additionally, MPE estimates for less than 20 cm are not considered valid. Note that the provided example for RF exposure did not calculate power density, but simply compared worse case conducted and EIRP power to the FCC requirements for when SAR is necessary if a device is considered portable and reached a conclusion based upon this. MPE was therefore not calculated. Please reference the attached example again.
- 3) FYI.....If this device is also being approved under a DoC for the PC peripheral portion, then the users manual must also include the following information for DoC's on a single page. Please ensure that the manufacturer implements these changes to the manual.

COMPLIANCE INFORMATION FOR DoC AUTHORIZATIONS (47CFR 2.1077)

If a product is tested and authorized under a Declaration of Conformity, a compliance information statement shall be supplied with the product at the time of marketing or importation, containing the following information on a single page:

- (1) Identification of the product, i.e. name and model number.
- (2) A statement similar to that contained in Section 15.19(a)(3) that the product complies with Part 15 of the regulations.
- (3) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.

A handwritten signature in black ink, appearing to read 'Timothy R. Johnson', with a stylized flourish at the end.

Timothy R. Johnson
Examining Engineer

[mailto: tjohnson@AmericanTCB.com](mailto:tjohnson@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.