



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

November 23, 2004

RE: Ortech

FCC ID: SFU1008552

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

- 1) The label exhibit does not actually appear to be a label. Additionally, from the external photographs it appears that the FCC ID may be in the plastic mold or imprinted, not on a label. Please clarify the label exhibit for this issues.
- 2) The key appears to be fully inserted into foam. It appears that the entire antenna is encased in the foam. We have seen where some materials placed directly around or on the device/antenna can de-tune the circuitry. For this device, was it checked with and without the foam to ensure similar results. Note it would have been preferable to only insert the metal portion into the foam and leave the TX board above the foam area.
- 3) The correction factor applied is based upon duty factor and also does not appear to match the data.. Note that duty cycle must take into consideration a worse case TX during 100 msec maximum, not complete period. Further detail is necessary as to the period/duty factor of one word, the TX on time for both small and large bits, etc. This information must be looked at over 100 msec as well. Please correct. Note this will affect the calculations utilizing duty cycle as well.
- 4) The limit for 630 MHz appears incorrect. Shouldn't this be 55.6 dBuV/m?

IC considerations:

- 5) Please adjust the RSP form to match any changes due to item 3 above.
- 6) 1260 MHz falls in a restricted band in Canada.

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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.