



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

March 10, 2006

RE: Uni-Tat International (HK) Ltd.

FCC ID: T2E-UTMRR05-GENIS

I have an additional comment on this Application and your responses to my comments of March 4, 2006. Depending on your responses, kindly understand there may be additional comments.

- 1.) Your explanation to my comment #1 from March 4, 2006 is not completely satisfactory. Please note that devices which operate at a periodic rate less than 20Hz do not properly respond to Quasi-Peak instrumentation weighing filters and therefore are excluded from using the Quasi-Peak measurement principals. In this case the footnote to 47CFR 15.35(a) applies. This means you cannot use the Quasi-Peak function during any measurement, and you must maintain the CISPR bandwidths (100KHz below 1GHz / 1MHz above 1GHz). Peak values are recorded and are allowed to be de-rated to "average" during a 100msec period using the method explained in 15.35(c). Please be advised that peak emissions cannot be de-rated by more than 20dB as specified in 15.35(b). As an example, a peak field strength reading of 10,000 microvolts on a pulsed emission of 10 milliseconds out of 100 milliseconds can be de-rated by 20dB to 1000 microvolts. However, that same emitted field strength on a pulse less than 10 milliseconds cannot be de-rated by more than 20dB. You will need to make precise measurements in zero-span mode of the pulse width using a 100millisecond sweep time. The longest observed pulse decides the correction factor using  $20\log(T_{pulse} / 100ms)$ . Kindly review and correct.
- 2.) Please confirm the function of the "distance switch". Does it change the pulse width or pulse repetition rate? Or does it change the actual radiated field strength? In other words, how does this work?

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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.