



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

June 30, 2005

RE: Inventec (Shanghai) Corporation

FCC ID: TEG045455

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

- 1) The 731 form, Section III, 6(a)/(b) appear to be incomplete or missing information. Please correct.
- 2) The block diagram should show the frequencies of all oscillators in the TX portion of the 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 clearly shows this part and the manufacturer of the part is different than the applicant. Please update the list of confidential exhibits if necessary. It appears that the block diagram shown in the operational description may be sufficient for the block diagram. Please review as necessary.
- 3) The block diagram also appears to show a CDMA module, which is not covered by this application. Please explain, as this approval will not cover this currently and this would require a new FCC ID for the device once this is installed..
- 4) The schematics do not include the TX portion of the device. 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. If necessary, please update the confidentiality letter to include the parts list.

Note that for items 2 & 4, most Labs from Asia provide the block diagram and schematic of the mini-PCI card.

- 5) It appears this certification is intended for the hand held transmitter and not the base. However the label exhibit clearly shows the label being placed on the base. Please explain/correct as necessary.
- 6) For Part 15 devices, the FCC generally wants to see more detail on the general internal construction for this type of device. If possible, kindly provide further details to give a better idea of its construction.
- 7) Antenna information provide mentions measurements with notebook open and closed. This device does not appear to be a notebook and therefore these measurements seem unrelated. Please review/explain as necessary.
- 8) Section 15.15(b) prohibits adjustments of any control by the user that will cause operation of a device in violation of the regulations. Accordingly, any proposal to allow the end user to choose extended channels on frequencies outside of an allowable frequency band in the USA is not acceptable. For example, a WLAN device operating according to Section 15.247 on channels 1-11 between 2.4 - 2.483.5 GHz must not have any user controls or software to allow the device to operate on channels 12 and 13 which are outside of the allowed USA band. For instance, the user should not be able to select alternative countries which would allow different channel plans outside of the allowed USA band. Please explain how this device is compliant to this requirement.
- 9) The users manual mentions both mobile and portable information, however SAR reports were not provided. Please explain, correct as necessary.

- 10) The device is considered portable and therefore according to ANSI C63.4, for radiated testing this should have been positioned in each of 3 axis in effort to obtain worse case results. The report does not support this.
- 11) Please explain the LgAv denoted on the peak plots on pages 22 through 23. Shouldn't these be peak plots?
- 12) Please upload the RF exposure information in the report as a separate RF exposure exhibit. Additionally, please note that the FCC no longer desires that the safe distance for mobile devices be calculated in the RF exposure exhibit if the safe distance is < 20 cm, but instead prefers the power density results to be calculated at 20 cm and compared to the power density limit. Calculated distances for < 20 cm are not considered valid.
- 13) Page 36 mentions measurements < 1 GHz were made at 10 m. However limits appear to be shown at 3 meters. Please explain at what distance measurements were made and if not made at 10 meters, where are correction factors applied.
- 14) Page 37 mentions measurements > 1 GHz were made at 10 m. Due to FCC rules, limits, and dynamic range issues this is highly unusual. Additionally, limits are cited as 3 meter. Please explain.



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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.