



# American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

September 30, 2006

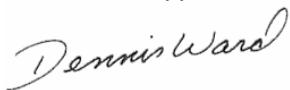
RE: FCC ID: TLDBLUECHECK\_ATCB004073

Attention: Peter Lin

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please show on the schematics where the BT circuitry is located. If the BT circuitry is not on the provided schematics, please provide schematics of the BT transmitter.
2. Please note that 15.247 is not a test method. Please also note that ANSI C63.4 2003 is not a proper test method for FHSS devices except for setup. Please note that testing of FHSS devices such as BT transmitters must be done in accordance with the approved FCC test method DA00705. Please provide a test report that shows the proper test methods of DA00705 have been followed and used. Please note a clear reference to the DA00705 in the report.
3. Please note that page 7 of the report states the device is compliant to 15.239 of the FCC rules. Please note that 15.239 is for FM modulators operating in the 87-107MHz range. Please note that this is a BT transmitter operating in the 2402-2480MHz range. Please report results to the proper CFR 47 rule part 15.247.
4. Please note that page 12 of the report states that the average conducted emissions "Reading" column at 2.269MHz is 159dBuV/m. While this may be a typographical error please correct the test report to show compliance to the limits found in the rules.
5. Please note that DA00705, the proper test method that must be referenced for FHSS devices, states that band edge compliance is to be made in both frequency hopping stopped mode and frequency hopping enabled mode. The test report only appears to show hopping enabled. Please provide evidence that the device is compliant to band edge requirements in the required hopping stopped mode as defined in DA00705.
6. Please note that for spurious emissions, even if all readings are greater than 20dB below the limit, the FCC requires that at least 6 readings, even if they are the noise floor at the harmonics of the transmitter fundamental, must be reported. Please note that your report only provides 2 spurious emissions readings. Please provide the necessary 6 readings for signals in the restricted bands.
7. FYI - Please note that for dwell measurements DH1 is not the worse case. Please note that the worse case dwell for a BT device is about 250-350-ms. Please note that as BT dwell is not an issue with FCC filings, when measured, the report must address the worse case dwell.
8. FYI - Please note that Power Spectral Density measurements are not a requirement for FCC approval and should not be included in BT test reports for FCC compliance.
9. Please note that as the device was tested to 15.247, the equipment type on the 731 should be DSS and not DXX. Please correct.
10. FYI – please note that as this device is also a computer peripheral device, the part 15B portion must either be certified or DoC. Please note that the label provided does not contain the DoC label for FCC as defined in 15.19(b) and the 731 does not request certification of the computer peripheral portion. Please note that the device label must address all FCC issues. If not certified the device must contain the DoC label specified in 15.19(b). Please address this issue.
11. Please note that no request for confidentiality was provided with this application. Please note that this means that the schematics, block diagram and operational description will be public view once it is uploaded to the FCC. If confidentiality is desired for these exhibits, please provide a properly signed request for confidentiality. Please make sure that the letter references part 0.459 as the rule section for requesting confidentiality.
12. FYI – please note that as the power output of this device is less than 1mW, collocation and rf exposure concerns do not have to be addressed in the manual.
13. Please note that this device appears to be more than sufficiently large to accommodate the 2-condition statement required in 15.19. Please provide proper justification in accordance with 15.19(a)(5) as to why this required statement is in the manual and not on the device. Unless

reasonable justification can be made please provide a label on the product that contains this statement as required by 15.19(a). Please note that size does not appear to be a justifiable reason as there appears to be more than adequate room on the device for the statement.



Dennis Ward  
<mailto:dward@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.