



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

May 30, 2007

RE: FCC ID: U3K-AJ420_ATCB004966

Attention: Hoosamuddin Bandukwala

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 provide an appropriately drawn Block diagram.
2. Please define what the term "how work" means in the request for confidentiality. Do you mean the operational description? If so, please correctly identify this exhibit. Please also note that the parts list is not needed for part 15 submittals.
3. Please note that internal and external photos of a part 15 device cannot be confidential material. Please remove the photos from the list of confidential exhibits requested. If this is desired to be held in temporary confidentiality, please provide the appropriate request for short term confidentiality.
4. Please provide the required photos of the top and bottoms of all boards. Please show how the boards fit into the device.
5. Please note that the photo of the label placement shows the label to be of paper. Please note that this is not allowed. Please provide a label photo of the device with an actual label containing the FCC ID of the device. Please explain how the label is to be permanently attached to the device.
6. Please note that the limit for 15.239 devices is 48dBuV/m at 3 meters average. Please note that while the device also has a 20dB peak limit over this average, the average limit that must be reported for compliance. If the peak level is below the average limit, then no further testing is needed. Please note that all readings reported on page 14 of the report are over the average limit. As the table does not state if these are average or peak readings, it can only be assumed that the device is not compliant to the limits stated in the rules. Please resubmit a report that properly shows compliance to the average and peak limit requirements specified for 15.239 devices. Please give drive levels and modulation content information for the fundamental.
7. Please note that 2.1033 requires a sample of the formula used to determine compliance. Please provide a report that properly gives the formula used to determine compliance using the associated correction factors. If the analyzer uses pre-entered factors, please explain.
8. Please note that the plots for occupied bandwidth measurements appear to show significant differences between the low and high frequency. For example, the bandwidth at 107.9 is only 61.5kHz while the bandwidth at 92.1MHz is 170kHz. The FCC has stated that a 15.239 device should be modulated with the maximum audio signal in the linear range (no audio distortion). Please explain the modulating frequency used, why the plots are so different and please provide evidence showing the device was tested being modulated with a maximum audio signal in the linear non distorted range. How was the occupied bandwidth measured? What was used to drive the audio input circuitry? What drive levels and modulation content was used. Please show how the modulation of this device meets the requirements of ANSI C63.4 and 15.239.
9. Please note that this device appears to connect to the ac mains (i.e. see test setup photos of the device connected to a LISNs. Please provide the conducted emissions data for the device.

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.