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26 March 2007

American TCB  
6731 Whittier Avenue  
McLean VA 22101

RE: Cool & Useful Products LLC  
Response to 2-16-07 Comments

FCC ID: UR3CUP002

In response to your comments on the above submittal from 2-16-07.

1. ATCB Comments: Block diagram & Operational Description cites the device is capable of TX from 87.5 MHz – 107.9 MHz. This is outside the allowable band. Please note 15.15 of the rules as well as this does not match the 731 form.

**RESPONSE: See revised documents uploaded to ATCB.**

2. ATCB Comments: Regarding the bandwidth test, the FCC has been requesting using a typical audio file (music) during the bandwidth test with maximum input drive to the device as well as maximum output levels. Please see attached and clarify or correct as necessary.

**RESPONSE: See revised test report uploaded to ATCB.**

3. ATCB Comments: For purposes of all the tests, please document the type of input and the drive level used from the host device (i.e IPOD) and the user controllable features. The FCC expects any adjustments from both the host and the device itself to be set to maximum input and output levels. Please correct as necessary.

**RESPONSE: See revised test report uploaded to ATCB.**

4. ATCB Comments: Due to the nature of this device (portable), it should have been tested in all 3 axis to obtain worse case as required by ANSI C63.4. Test data does not support that this was performed. Please review.

**RESPONSE: See revised test report uploaded to ATCB.**

5. ATCB Comments: Please provide information (Note FCC asks lab to perform a test, not simply state users manual or operational description information) to explain the absolute lowest and highest TX frequencies for each band available in the device. Note that currently the FCC is asking that the test lab report the minimum/maximum channels that the tuning controls were manually capable of adjustment to in effort to verify maximum tuning range and not simply a manufacturer explanation. Please have report updated for this.

**RESPONSE: See revised test report uploaded to ATCB.**

6. ATCB Comments: When Average limits are reported, the peak levels should also be reported to show compliance with 15.35.

**RESPONSE: See revised test report uploaded to ATCB.**

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7. ATCB Comments: Test report states carrier only – no modulation. This is NOT correct. Please see below and correct.

**RESPONSE: See revised test report uploaded to ATCB.**

8. ATCB Comments: Because of the FCC's "Permit But Ask" procedures for 15.239 devices, we are now required to submit a certain amount of information to the FCC separately from information already provided in the application. Even if this information may be found within certain exhibits, the FCC requires that we submit the following information in a separate file as part of the "Permit But Ask" procedure. To get this part of the process going, please provide a separate file that provides answers to the following information AS SOON AS POSSIBLE:

**RESPONSE: See exhibit uploaded to ATCB.**

Please let us know if anything further is required.

*Susan L Rupp*

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