



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

August 1, 2007

RE: FCC ID: VH7-JW01R\_ATCB005252  
Attention: Natasha Tai

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 note that the FCC ID label sample is blurred and cannot be easily read. Please provide a sample label where the FCC ID number can be easily read.
2. Please note that for part 15 intentional radiators 47CFR part 2.1033(b)(5) states, "A block diagram showing the frequency of all oscillators in the device. The signal path and frequency shall be indicated at each block. The tuning range(s) and intermediate frequency(ies) shall be indicated at each block." Please note that the functional block diagram provided does not appear to meet this requirement as it shows no clocks or oscillators etc. Please provide a block diagram that meets 2.1033(b)(5) requirements.
3. Please note that the 731 states the conducted power is 21.53mW. Please also note that the antenna gain of the device is listed as 2dBi. Please note that the FCC has stated that if either the conducted or EIRP of a device operating in the 24.GHz range exceeds 24mW SAR would be required. Please note that with 21.5wmW (13.3dBm) and a 2dBi antenna the EIRP of the device would be 15.3dBm or 34mW. As the device is a headset worn on the head near the ears, this means that the device requires SAR measurements. Please provide the required SAR measurement data for this device. Alternately, please provide the calculations and justifications for not performing SAR on this device.
4. Please note that the test report shows a calculation of duty cycle which appears to be used to determine an average power. However, please note that the table states an analyzer was using the average detector. Please explain if the values given include both the duty cycle average and the analyzer being in average detector, or if the values only show duty cycle averaging.
5. Please note that in addition to item 4 the duty cycle average allowed for FHSS devices must be done in accordance with the accepted FCC procedures for Frequency hopping spread spectrum devices. Please confirm this procedure was used.
6. Please note that while you have provided the overall list of frequencies used, it does not appear that you have provided the required pseudo-random hopping sequence. Please provide the pseudo-random list.
7. Please note that the manual shows an ac adapter as an accessory. Please note that if the device can be used during the time that the ac adapter is connected to the device it will need to have conducted line emissions testing performed. Please explain and please provide and conducted emissions data that may be needed.
8. Please note that should SAR measurements be required in conjunction with item 3 above, please ensure that the manual includes the necessary rf exposure information.
9. Please note that additional questions may result depending on the responses to the above items.

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](http://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.