



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

May 13, 2004

RE: FCC ID: BW3DB-2042S3_ATCB001337

Attention: Ellis Wu

I have a few comments on this Application.

1. Please note that the operational description for a licensed device needs to consist of "a description of all circuitry and devices provided for determining and stabilizing frequency, for suppression of spurious radiation, for limiting modulation, and for limiting power." Please provide an operational description of the device that meets 2.1033(C)(10). Please note that pages 3 through 5 of the factory tune up procedure are more correctly in line with a licensed device operational description.
2. Please note that licensed devices require a parts list of all active parts in the product. Please provide a parts list for this device.
3. Please note that page 22 of the SAR report states that for the PCS liquid you used HSL2450 and MSI2450 when it should have been HSL1900 AND MSL1900 as stated on page 21. Please note that this is incorrect. The liquid used for SAR testing must be within 100MHz of the target frequency. As the liquid stated is over 400MHz from the target frequency the table is incorrect. Please retest the device using the proper liquid. Alternately, please explain the error and please provide evidence that the results in the table are correct.
4. Please note that you have not provided the emissions designators nor the frequency tolerance on the 731 form. It appears from some of the exhibits that the device may use GPRS yet some exhibits only say GSM. Please explain and please provide the emissions designators for all modulation types.
5. Please note that the maximum reported SAR in the manual and that reported on page 17 of the SAR report do not appear to match the maximum SAR shown in the test data. You appear to have measurements in excess of 1 w/mg. Please review your test data and report the maximum SAR values in the summary and in the manual.
6. Please note that in the tables you report a 3mm separation for body worn configuration, however, page 14 of the SAR report states 15mm (1.5cm) is used. Please correct the SAR report to be consistent to the actual separation distance used.
7. Please note that the manual must clearly state the body worn accessories. Do they have metal in them? Do they keep the stated 1.5cm separation distance? Generally this is done by stating that accessories used in body worn configurations contain no metal and must keep 1.5cm separation from the users body. Please account for body worn configuration in the manual.
8. Please note that radiated emissions for licensed devices under part 24 are power measurements in EIRP done using antenna substitution methods in accordance with TIA603. Radiated emissions for licensed devices are not field strength measurements. Please note that it does not appear that you have made radiated emissions measurements in accordance with TIA603 using antenna substitution methods. As this is not a field strength measurement but an antenna substitution measurement, please provide antenna substitution test data showing compliance to -13dBm radiated limits.

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.