



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

November 21, 2004

RE: FCC ID: NI3-SN1302_ATCB001931
Attention: Ellis Wu

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 while you have provided a list of frequencies used in the device, you have not provided a sample of the pseudo-random hopping sequence used in the device. Please provide the sample list of pseudo-random hopping used.
2. Please note that if you are going to use the peak or quasi-peak readings to determine compliance issues, then you must compare these peak or quasi-peak readings to the proper limit. For conducted emissions when using only peak readings you must compare these peak readings to the average limits, not the QP limits. For radiated measurements, when using peak readings to determine compliance above 1GHz, you must compare the peak readings to the average limits NOT the 20Db above average peak limit. Consequently this means that your compliance margins are not accurate. For example, on page 14 of the report you state a margin at 306kHz of 10.1dB. Please note that since you only did the QP measurement the actual compliance of the device is only 0.1 dB under the limit as the correct comparison for compliance MUST be done to the average limits. Similar problems are indicated in the radiated data (see pages 34 of the report). Please report compliance issues to the correct limits.
3. Please explain why you are comparing 1829.7MHz (page 30) to restricted band limits. Please note that similar problems showing failure occur at 1855MHz on pages 33 of the report. Please review the data in your report and compare the emissions readings to the proper limits.
4. Please explain why QP readings of the fundamental on pages 7 through 9 and 14 through 22 of the report were taken.
5. Please explain why you are comparing a fundamental reading to a 15.209 limit on page 22 of the report.
6. Please note that the maximum conducted power in the EMC report is 681mw, while the maximum conducted power in the SAR report is 676mW. Please note that when a difference between SAR and EMC power exists, then the SAR power level must be the higher power level. Please explain why the SAR testing was not done at the same or higher power as the EMC reported power level.
7. Please verify the serial number of the dipole used in the validation plots in the SAR report.

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.