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

September 14, 2005

RE: FCC ID: JVPM580_ATCB002769
Attention: Jewel Chen

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. FYI – Please note that the only item on the confidentiality request is the schematics. As such items usually desired as confidential such as the operational description, parts list and tune up will not be held confidential and will be for public view. If these items are desired to be confidential, please include them on the confidentiality request.
2. Please note that the sample label provided is for FCC ID: JVPHERC1. Please note that the FCC ID number for this device is FCC ID: JVPM580. Please provide the correct FCC ID label sample for this application.
3. Please note that this is a composite device. Please correct the 731 and any appropriate documentation to clearly show composite.
4. Please note that while the manual has EU SAR information, it does not contain any of the SAR information for the US. Please provide the required SAR statements in the manual. Please include the Head and Body SAR levels. Please note that as SAR testing for Body Worn configuration was done without a specific holster or belt clip, any appropriate commercially available holster or belt clip can be used. As such, you must also include the statement that body worn accessories must not contain metal and you must specify the separation distance.
5. Please include the required Part 15 statements in the manual. This includes the 2-condition statement of 15.19 as well as the information to user in 15.105 and the non-modification statement in 15.21.
6. Please note that the correction factors in the tables on pages 16 through 18 of the BT test report appear to be in question. For example, the first entry on page 16 has the correction factor of 64.601dB. The formula used states the Emission Level = Reading level + probe factor + cable loss – PreAMP. This does not match the value labeled “Correction Factor”. It is assumed Correction Factor is the antenna (Probe) + cable loss – PreAMP. If this is the case then the corrected reading for the first reading would be 43.458dB + 64.601dB or about 108dBdBuV/m. Please explain the number and how they were derived. Please correct the tables to show accurate values.
7. Please note that the test setup photos provided as a separate exhibit appear to be the part 24 test photos. The BT test setup photos appear to still be in the report. Please provide separate BT test setup photos for the BT application.
8. Please note that in the results tables in section 8 of the SAR report you states Maximum conducted power as 33dBm, then at the bottom you state actual conducted power just under 30dBm. Please explain why there is first a 3 dB difference between these numbers, and second why the actual conducted values alone were not used.

Dennis Ward

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.