



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

March 14, 2005

RE: FCC ID: QMNRH-77_ATCB002210

Attention: Mary Washington

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 radiated spurious emissions do not appear to have been done using the antenna substitution method. Is the claim of the report that because the field strengths are more than 20dB below the -13 dBm point that no actual antenna substitution measurements need to be made? Please explain. Please justify this approach.
2. Please note that there is no indication in the report as to how you derived the EDRP values for the device. This is supposed to be a measured antenna substitution method. Please also note that the 90mW ERP reported does not appear to substantiate the 1.2w/kg SAR values. Please confirm and describe how this measurement was made. Please explain and provide the equation used to determine the value and please provide some indication as to how the individual factors were included in the final result.
3. Please note that other than references to certain documents the report does not provide information on test methods used. Please provide some information as to how the antenna substitution of TIA 603 was incorporated into the test methodology used to test this device.

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.