



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

April 20, 2005

RE: FCC ID: JVP56E21_ATCB002333

Attention: A-Joe Liu

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 Occupied Bandwidth data only says >200kHz. Please provide the actual measured occupied bandwidths on pages 16 through 18 of the report. This is needed to justify the emissions designator provided.
2. Please note that the report states that all validation SAR values are normalized to 1 W, but the validation plots state the input power is 1 W. Please verify and explain.
3. Please note that the uncertainty budget seems low. Normally it would be expected that the expanded uncertainty would be in the neighborhood of 23 to 30%. The expanded uncertainty of this system is being reported as 18.4%. In reviewing the entries in the budget it was found that several reported values are significantly less than typically expected. For example, the boundary effect would typically be in the neighborhood of around 7 to 8% but you are reporting only 1% and the calibration data indicates at least 2%. The power drift would typically be in the neighborhood of 5% but you are reporting only 0.1% while the actual power drift shown in the data exceeds 7.4%. Please verify and confirm/correct your uncertainty budget.
4. Please note that the power drift in the SAR report exceeds 7.4%. Please explain what was done to verify data in accordance to OET65C and IEEE 1528 when power drifts exceed 5% (i.e. SAR over time data etc.).

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.