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

May 26, 2005

RE: FCC ID: O6Y-UT611_ATCB002460

Attention: Rick McMurray / Kathy Grzovic

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 it is generally expected by the FCC that for part 24 devices held to the ear the highest SAR value is reported in the manual. The highest head and body SAR. While it may not be specifically required in OET 65 or IEEE 1528, it is generally accepted. There does not appear to be any specific SAR values listed in the manual for this device. Please explain.

Response: Please refer to the revised manual uploaded with this response.

2. Please note that the SAR report, operational description and test report states the device is TDMA. Please note that TDMA (when categorized in an emissions designator) is typically a narrow band emission using DXW. Please note that the emissions designator for narrow band TDMA is typically 30K0DXW. The emissions designator you state is 268KDXW. The 268K is a wide band emission. Please also note that the duty cycle in the SAR report is 8.5: which is indicative of a TDMA wideband derivative. Please note that the typical narrow band emissions designator for TDMA devices and the apparent data in the test report and SAR report do not agree. It appears that the occupied bandwidth plots, SAR duty cycle and bandwidth in the emissions designator appear to be that of a wideband derivative rather than an actual narrow band TDMA signal. Generally such wideband TDMA derivatives would be a GXW designator. In this case possibly 268GXW. Please explain and please adequately address why this device is or is not TDMA as opposed to a wideband derivative modulation.

Response: The client has confirmed that 268KDXW is correct.

3. Please note that while you have marked the lower end of the line at 1910 MHz band edge as -14.8 dBm (page 21), zooming in of the plot shows the upper end of the plot line may to be over the limit at 1910 MHz (about -12 dBm). As the line appears to overlay the 1910 MHz line, it is not clear from the plot if the device is compliant or not. Please explain and provide clear evidence that the device is compliant.

Response: Please see Plot 7-3 in the revised test report uploaded with this response. This expanded-view plot shows the device is indeed compliant.