1) Most BlackBerry devices are thought to contain a licensed Part 22/24 transmitter. Please confirm if this device contains this type of TX or not.
[Masud Attayi] I confirm that this device does not contain Part 22/24 transmitter.
2) Operational description mentions both Part 15 and Part 24. However all other information appears to be provided only for Part 15. Please correct/explain as necessary.
[Masud Attayi] This is a typo, there is no Part 24 in this device. The operational description has been corrected as per attached file.
3) Devices tested and approved to Part 15 must be tested on a site registered with the FCC under 2.948 or under an accreditation system (NVLAP or A2LA) who lists the information with the FCC. The report and cover letter say that the site is listed, but the information given on the 731 does not appear to match any information on record with the FCC. Please explain. See details at:
https://svartifoss2.fcc.gov/prod/oet/cf/eas/reports/TestFirmSearch.cfm
[Masud Attayi] Our chamber is listed with FCC and the listing number is 778487. We are not doing Part 15 under DoC but under verification procecure which is why we submitted the Part 15 Unintentional results for review. We have followed this procedure for may years with FCC for many products as well as with ATCB for the last 3 products, and we never had any issue with it before.
4) Please confirm that you desire the grants to be released on December 31, 2004. Does this apply to both FCC and IC?
[Masud Attayi] We would IC to be issued immediately provided that no information will go into web site for public view if you issue IC now. Please confirm that this application and it's documents will not become public knowledge if you issue IC immediately. As for FCC grant please keep the deferral as the current date of December 31, 2004.
5) The last page of the users manual suggests GSM support. Please explain/correct as necessary as this application does not appear to cover this.
[Masud Attayi] Again this is a typo, there is no GSM support. The User manual has been corrected and a copy of the corrected one is attached here.
6) Radiated spurious data is only shown for the 2nd harmonic. Please confirm that testing was performed from 30 MHz - 25 GHz while the device was in a TX mode of operation.
[Masud Attayi] Yes I confirm that the testing for radiated spurious in TX mode was performed to the 10th harmonics (25 GHz). As you can see it's noted at the end of each table that the harmonics above 2nd up to the 10th harmonics (25 GHz) were in the noise floor, see RIM-0111-0409-01, Appendix 2, page 25 of the attached report.
7) Please clarify if you are asking for:
a) Certification of the device as a TX, and a DoC has been performed by an appropriately accredited test lab for a PC peripheral
b) Certification as a TX + PC peripheral.
[Masud Attayi] We have done option b) in the past for many years and never incurred additional cost as composite application. Please check our previous 3 applications handled by ATCB which followed the same procedure.

Note 1: The option b) would be considered as a composite application and 2 certificates (one for the TX, one for the PC peripheral portion) would be issued. Note that there are additional review costs associated with this additional certification.
Note 2: To qualify to perform DoC applications, the test lab must be accredited (i.e. NVLAP or A2LA) to perform testing under the DoC procedure. ECC does not appear as an accredited test lab on the FCC site. Please explain.
Note 3: Note that for DoC tests, the device is configured with a minimum test configuration as specified by ANSI C63.4 which includes complete computer + 2 I/O devices attached (one may be the EUT) during this particular test..
Note 4: For DoC authorizations, the label should also include specific labeling information and also the users manual should include information regarding Part 2.1077.
8) Bandedge compliance must also be shown to meet the peak/average limits of 74/54 dBuV/m for highest emissions falling in the <= 2.39 GHz and >= 2.4835 GHz restricted bands located near the bandedges. Please provide
[Masud Attayi] Band edge is performed in conducted mode and the limit used is referenced to the carrier in dBc. This was the procedure we followed for our Bluetooth products which uses the same band and FCC standard. Please refer to the attached report RIM-0111-0409-01, Appendix 3, page 32 for band edge results which has a margin of > 36 dB.
9) All AC power line conducted measurements are labeled with ICES-003. They are therefore assumed to be taken with the device in a RX and/or or idle mode of operation. If the device can function (transmit) while powered from the AC adapters, compliance must be shown to 15.207/RSS-210 in this mode of operation as well. Please comment and/or provided additional data as necessary.
[Masud Attayi] The conducted AC power line test was performed in TX mode. The results should have been presented in

the 15.207/RSS-210 report. This has now been corrected and attached here.

10) FYI.....For 6 dB bandwidth, the cursors should be placed on the widest points of the envelope, not the narrowest 6 dB. Plots show that the widest 6 dB bandwidth was not actually measured. Please be careful of this on future applications.

11) FYI..... Conducted emissions for Canada RSS-210 as shown in the standard are strictly using the old FCC limits (48 dBuV) and not to EN55022. Compliance was noted to meet after careful review, but to facilitate easier reviews in the future comparison to the correct limits would be desired.