



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

July 29, 2005

RE: Cardo Systems Inc.

FCC ID: Q95AD02

After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) The test photos only show the device in a horizontal position on the table top, yet the report states it was tested in 3 axis. This type of device should have been tested in all 3 axis. Please confirm if testing in all 3 axis was performed.
- 2) For horizontal positioning, it appears that this device may have been placed directly on the table top. Given that the device's case was not present, and the concerns that the FCC has raised in the past about directly placing the board/antenna directly on the table, this position should have been tested with the device insulated from the table top by at least a few cm. Please confirm that this was performed, or check the data for this
- 3) The confidentiality letter does not include the parts list. If confidentiality is required on the parts list, please update the confidentiality letter.
- 4) RF exposure information from the manual states:

FCC RF Radiation Exposure Statement:

This equipment complies with FCC radiation exposure limits set forth for an uncontrolled environment. End users must follow the specific operating instructions for satisfying RF exposure compliance. This transmitter must not be co-located or operating in conjunction with any other antenna or transmitter.

However, please note that specific use instructions the end user must follow do not appear to be provided. In other words, it is uncertain if the device can be used in a body worn condition, or only if the cellphone is intended to be positioned away from the body when this device is attached (mobile condition). Please note that further concerns regarding portable use may be raised and or need to be addressed with the FCC if this is intended to also be used with a cellphone in a body worn condition. Please update the manual to provide specific guidance instructions to the user on how the device should be used.

- 5) It appears that the device was tested as a board only. However, it is uncertain whether the case contains any shielding properties. Please provide details of the case of the EUT, including photographs as necessary to show the inside views of the case.
- 6) Page 37 shows average data, but from description of operation during test, it appears the device was not in constant transmit. Therefore the data should have been measured with a VBW > 1/Ton time for average measurements. Was this performed?
- 7) Please document the report with the audio mode settings/levels used for testing.
- 8) FYI....It is recommended that a separate RF exposure exhibit be provided to fulfill the requirements of 15.247(b)(5).

IC Issues:

- 9) The second page of the IC form does not appear to have been provided. Please provide. Also for the future, please note to use the newest version of our form. I have provided as a separate attachment.
- 10) The Agent Letter provided for IC mentions RadioNet Ltd and not the applicant. Please explain.
- 11) The RSS-102 attestation mentions a 60/f limitation. Note that IC does not currently recognize this same limitation for devices as their limitations (100 mW) are only valid up to 2.2 GHz.



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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.