



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

September 10, 2003

RE: FCC ID: PPIRH-50

Attention: Thomas Reitmayer

I have a few comments on this Application.

1. Please note that Part 24 radiated emissions limits are EIRP. Your test report indicates that antenna substitution measurements were made in accordance with the accepted TIA603 methods. However, it is not clear from the table listings if these number are the EIRP values or the values. Please clearly identify if the values in the table are the EIRP levels of the emissions Please show a sample calculation as required by 47 CFR part 2 providing the antenna gain of the substitution antenna
2. Please note that starting on page 59 of the report, you incorrectly reference part 24 for the 824 to 849 MHz Part 22 frequencies. Please correct the report to provide the proper part 22 reference sections. Please also use the proper section quotes when referencing limits etc.
3. Your radiated emissions section on page 64 of the report would indicate that you are providing EIRP data. Please note that part 22 is an ERP limit for radiated emissions. Please clarify and provide the correct data (ERP) in the tables. Please reference and quote the proper part 22 sections. Please show a sample calculation as required by 47 CFR part 2 providing the antenna gain of the substitution antenna.
4. Please verify that all measurement equipment was in cal during the time of testing.
5. Please note that the summary of SAR results only report on the Part 22 SAR levels measured. Please provide the summary data for the Part 24 maximum SAR values measured.
6. The crest factor for GSM is typically 8. Please note that on the plots for the 850MHz device you have a crest factor of 8 on all but the last plot where you state a crest factor of 4. Please correct this error, or alternately, please explain if this is GSM or GPRS. Also, please note that it is not clear what the operating frequencies of the plots on pages 31 to 34 are. Please clarify.
7. Please note that for the 1900 MHz band you state GSM on all plots but you list a crest factor of 8 on some and a crest factor of 4 on others. Please correct the crest factors on the plots and please correct any data that may be affected by these factors. Alternately, please verify that the plots using crest factor 4 are GPRS (i.e. even though GPRS and GSM are similar modulations the correct modulation needs to be clearly identified).

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.