



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

January 30, 2004

RE: FCC ID: LJPRX-9_ATCB001078

Attention: Kare Oksanen

I have a few comments on this Application.

1. FYI - Please note that MPE for the 824 MHz band has been provided, but MPE for the 1900 PCS band does not appear to have been provided. While the calculated safe distance would obviously be better than the 800MHz calculations due to power etc, the MPE for all bands should be considered in the MPE report.
2. Please note that you have stated on the 731 that this is a device that is held to the ear (PCE). However, the device is a mobile module with an antenna that is to be kept at least 20cm from the body at all times. As a mobile module, this would be classified as a Licensed Base Station (PCB equipment code). Also please note that the power listed on the grant for equipment code PCB would be the conducted power at the antenna terminal. The ERP and EIRP could then be listed in the grant notes. Please correct the 731 to reflect the proper equipment code and power listings.
3. Please note that the report states the use of ANSI C63.4 as a "Standard Test Condition". Please note that ANSI C63.4 is primarily for use with unlicensed Part 15 devices. Except for the mention of ANSI C63.4 section 5.4 for OATS requirements during ERP/EIRP measurements in TIA603, ANSI C63.4 is not an appropriate reference for licensed PCS devices. Please explain why ANSI C63.4 was used.
4. Please note that the MPE report states that a "Customer Supplied" antenna can have a gain of 6 dBi. Please note that the manual (page 31) states that the antenna gain for other than that supplied in the "sales package" is not to exceed 3dBi. Please explain and reconcile the conflicting statements.
5. The manual does not state that the antenna provided in the "sales package" is 6dBi. Also, the report does not clearly identify the gain of the EUT antenna used during ERP and EIRP measurements. Please verify that the ERP and EIRP measurements were performed using an EUT antenna with the maximum antenna gain allowed for the device (i.e. 6dBi).

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.