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

February 16, 2005

RE: FCC ID: HP9MR100A_ATCB002162
Attention: Gregory M. Snyder

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. Please note that the manual states that this module can be placed into handheld devices. Please note that, if such handheld can be placed near the head or worn on the body, this puts the rf exposure class as portable. If this is the case then head and/or body SAR would be required. Please also note that as the conducted power of this device is about 1W and the gain of the antenna is about 6dBi, testing in three hand held hosts may be applicable. Please clearly identify the type handheld devices this module will be used in and please provide SAR test data in the cases where such hand held hosts can be worn on the body.
2. FYI - Please note that the manual states 23cm separation while the MPE shows 20cm separation. Please be consistent in the rf exposure issue. While the 23 cm may be used in the manual, please note that this may bring questions from the FCC as to why the distances are different between the MPE report and the manual.
3. Please note that the manual needs to contain instructions on placement of the statement "Contains FCC ID: HP9MR100A" on the host.
4. Please note that you have shown test setup photos that are supposed to be in accordance with ANSI C63.4. However, please note that C63.4 requires that the EUT be placed in the center laterally on the table top (i.e section 6.2.1.1 of ANSI C63.4 2003 – please see note on stand alone testing). The EUT in your setup photos is placed to the far side of the table. This is an improper test setup for part 15B testing.
5. FYI only - Please note that the accepted version of ANSI C63.4 is the 2003 version. Please note that you have incorrectly referenced the 2001 version. Please reference correct versions of test methods etc.
6. Please note that, while still compliant to the dwell time restrictions, the calculated dwell time on page 17 of the report appears to be incorrect. You state that the dwell time is 257.6ms; however, the plots indicate that as the pulse appears on the same channel 14 times and as the pulse width in the plot on page 17 shows 19.6ms, the dwell should be 268.1ms (i.e. 14 occurrences times 19.6ms). While this is not a large error, data should be accurate.

Dennis Ward

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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.