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

October 19, 2001

RE: UTStarcom, Inc FCC ID: O6YUTS-708SY

I have the following notes on this Application.

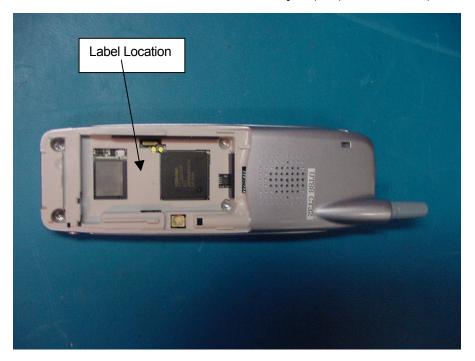
1. The internal photographs are way too grainy. The Commission will not accept these.

Pictures retaken

2. Parts list is unreadable.

Uploaded readable parts list. There are 4 files since I could not make the file smaller and be readable.

3. Orientation of the label in the device is unclear. Will it be covering the exposed parts? Will it meet the requirements in Part 2 for permanence?



4. Schematics and block diagram are identical exhibits. Only schematics are required under Part 2 of the Rules for licensed equipment. What do you wish to submit?

The Schematics and block diagram are not identical exhibits. They are 2 separate and different files. Notice the size of each file is different. Please check again.

The block diagrams are submitted to meet the requirements to provide sufficient clarity to reveal equipment construction and layout as met by photographs or drawings contained in the instruction manuals supplied with the certification request.

- 5. Warning statements in the manual are lacking. I will have to do further research before determining what, if any, statements are required. Please refer to page 1 of the user's manual.
 - Please provide a more complete description of how the radiated band edge compliance test was performed. Include all the appropriate measurement bandwidths.

Emission bandwidth was taken to determine the resolution settings for the band edge. It was found that 1% of the 262 kHz emission bandwidth was equivalent to 3kHz resolution. A radiated measured was used and the unit was maximized and an offset entered on the spectrum analyzer to achieve the corrected substitution measurement level as the reference level at a 1 MHz resolution bandwidth using max hold on the spectrum analyzer. The resolution was then changed to 3kHz and the plot taken with the display line at –13 dBm limit

Please provide description of modulation as required in Part 2 of the rules for Licensed equipment. Please justify emission designator. FYI: The 20dB bandwidth measurement is incorrect in the test report in plot 7-1 and 7-2.

● Page 2 October 29, 2001

Modulation description is included in the product description. Plot 7-1 was mislabeled and should be Channel 251. Plot 7-2 is the emission bandwidth taken according to 24.238(b). Plots and headings have been resubmitted to avoid confusion of occupied bandwidth and emission designator requirements.

8. Please provide conducted power output measurements in addition to the radiated EIRP. Details should be included such as peak, average, timing etc. as with any TDMA-type transmitter. Are the frame lengths fixed or are they variable? If so this may also affect power output measurement

Antenna is integral. Timing and frame lengths are included in product description and are fixed.

9. SAR report lists conducted Pout as 10mW. EIRP indicates approximately 100mW. It seems unlikely there is a 10dBi gain monopole antenna on this device. Please explain.

Power was submitted as peak and now made to agree throughout the report with the SAR report value, which was given in average. Revised SAR Report

Please note SAR report evaluation depends heavily on the resolution of the power output questions.

William H. Graff Examining Engineer

President and Director of Engineering mailto:whgraff@AmericanTCB.com

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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.