

November 12, 2005

RE: FCC ID: QMNRM-142_ATCB002937 Attention: Michael Mobley

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. FYI Please note that the test report mentions a number of tests that do not apply to this type device (i.e. SAT, ST etc). Please note that a test report should address only those tests that are specific to the device seeking certification.
- 2. Please note that in an email it was mentioned that this device is an EV-Do (EVolution Data Optimized or Evolution Data Only). CDMAone technology, while using the same rf components etc, is not under the 3GP generation of WCDMA such as the 1XEV-DO technology. Consequently the existing test methods for CDMA may not completely or accurately cover the later versions. The report only appears to address older CDMAone technology and does not address what was done to insure that all aspects of EV-DO was adequately tested (i.e. in section 4.7 of the report it is mentioned that an audio signal generator provided a 2.5kHz tone. How does this adequately test a 1xEV-DO signal under the most stringent data rates; and how does the test report address the data rate power control feature?). Please explain and/or please provide data showing at least the most stringent aspects of the device under test.
- 3. The ERP/EIRP data in the test report does not clearly indicate if the most stringent modes of the device were tested. Please explain.
- 4. Please review previous FCC questions on HAC and answer the following questions that the FCC has historically required to be addressed in HAC reports:
 - a. Please give full details of the phone control and setup during testing.
 - b. Please provide all data plots and contour maps for all device configurations tested. Please note that only 4 contour plots have been provided, but significantly more testing appears to have been done.
 - c. Please adequately address all exclusion blocks.
 - d. Please clarify if this device has 1xEV-DO capabilities. Please provide clear transmitter setup & operation capabilities to ensure that the device has been configured properly according to communication protocol and operating requirements to obtain valid HAC results. All modes must be tested.
 - e. Please give full details of the dipole antenna used and justification of the target values.
 - f. Please detail how drift was measured. Please provide details of the WD's signal. Include wideband and 0 span spectrum analyzer plots. How was the signal set up and controlled? What settings were used (i.e. power control modes, and radio service mode). Also, please include details of what exact standard the CDMA radio is capable of using i.e. IS-95 etc.
- 5. The SAR report does not appear to address the specific modes of operation in the device (i.e. 1xEV-DO modulation etc). Please address this issue.
- 6. Please note that based on the responses to the above comments further comments may arise.

Dennis Ward

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.