



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

November 28, 2005

RE: FCC ID: QMNRM-125_ATCB002803

Attention: Andreas Gillmeier

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 – for future report please consider the following. Please note that when reporting test results you must also report the test method used. Please note that the EIRP test results for the BT device only shows results but does not explain how the antenna substitution test was performed. The report should explain how EIRP testing was performed. For example, you list three frequencies, but do not explain if the FHSS device hopping was stopped and if the device was properly modulated. Was the test done to TIA 603 methods for antenna substitution method or was it done to an alternate method?
2. FYI – for future reports please follow the requirements of ANSI C63.4 for reporting spurious emissions. Please note that for part 15 devices ANSI C63.4 2003 requires at least 6 data points even if the device is more than 20dB below the limit. For intentional radiators ANSI C63.4 states, “For intentional radiators, for each of the frequencies to which the device is tuned, the frequency and amplitude of the highest fundamental emission, the frequency and amplitude of the three highest harmonic or spurious emissions relative to the limit, and the frequency and amplitude of the three highest restricted band emissions relative to the limit shall be reported.” Please report the required minimum 6 readings even if they are noise floor level.
3. Please note that the final measurement results must be justified. Please provide the antenna substitution factors in the table of final results on pages 13 and 14 of the QMNRM-125_Exhibit_6_Test_Reports_(Rad_power).pdf test report. Please also provide the formula used to reach the final number.
4. Please note that on page 15 of the test report QMNRM-125_Exhibit_6_Test_Reports_(FCC_2,22,24_conducted).pdf the plot indicates that the device fails the overlayed mask. Please explain.
5. Please note that the power drift in the HAC report is greater than 5% (approx 8%). Please explain how drift was measured. What settings were used (i.e. power control modes, and radio service mode).
6. Please provide some information on the justification for the target values. How were they derived/selected for this test report?
7. Please note that C63.19 does not deal with simultaneous transmission. This means that the simultaneous transmission of the cell and BT are not covered by C63.19 test methodology. Please justify this approach.
8. Please give more details of the phone control and setup during HAC testing.
9. Please review previous HAC submissions and verify that previous FCC questions have been adequately responded to for this application.
10. Please provide the probe calibration factors for SAR measurements. It appears that only the dipole cal factors have been provided.

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.