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

February 22, 2005

RE: DBTel Inc.

FCC ID: BW3DB-T302C

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

1.) I admit to a little bit of confusion. Please describe for me the differences and similarities of the Model F66 and Model F10. Are the differences only cosmetic? Are their changes to the antenna or antenna matching circuitry? Is the case material the same in both instances?
2.) Please remove the RF shielding ("tin cans") from the PCB when making photographs of the internal circuit boards. Kindly add these additional views to the existing photograph set.
3.) FYI: It is easier to manipulate files at the FCC website when the photographs are removed from the EMC Test Report. In the future, please consider submitting External and Internal photographs only, and not including them again as a part of the Test Report document. For the SAR report your current procedure is satisfactory.
4.) The Label includes an FCC logo. Can this device be considered a "computer peripheral" with direct connection via a cable to a computer?
5.) Photographs of the body worn position within the SAR report do not include the headphone seen in the external photographs. Please explain.
6.) The SAR report seems to indicate that only a standard 8:1 GSM duty cycle was tested. Is their any possibility that GPRS would be used in body or head positions? If so, then this will effect the SAR report. Please explain.
7.) Reviewing the Tune-Up Procedure, am I correct in assuming this is a Power Class I device with a conducted power of +30dBm? If so, then I have concerns with the stated tolerance. Variations in power of this magnitude [+/-3dB] combined with typical measurement uncertainty could easily produce SAR values very close to the limits. If GPRS was also possible in a body worn position, SAR values in excess of the limit become a very real possibility. Kindly review the RF power tolerance values described in the Tune Up Procedure and provide realistic expectations of the RF power tolerance.
8.) Take a quick look at the Occupied Bandwidth plots provided in the Test Report. It appears to indicate that 26dBc points have a bandwidth under 200KHz. This is obviously a typo. Kindly correct this notation.
9.) FYI: In the future, please upload the SAR reports at the ATCB website to the RF Exposure exhibit instead of the Test Report exhibit. This would greatly aid in my organization of files.
10.) This device contains GSM and DCS functions that are not available in the USA. If they are not to be used in this country, an attestation to that effect from the Applicant is required.

William H. Graff
President and Director of Engineering

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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.