



September 2, 2005

RE: FCC ID: RJE169069-00_ATCB002737

Attention: Leon Kogan

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 731 form does not have the equipment code under which this is to be certified. Please provide this information on the 731.
2. FYI – when requesting confidentiality the FCC likes to see the CFR47 reference paragraphs (i.e. 0.459).
3. Please note that while internal photos for part 15 devices (i.e. pcb photos) may be held in temporary confidentiality status for 45 days from the time of grant, these internal photos cannot be held in permanent confidentiality status. If the internal photos are desired to be held in temporary confidentiality, please provide a temporary confidentiality letter so stating. Please also remove the PCB photos exhibit from the permanent confidentiality request.
4. Please note that you have the file name for the external photos listed as temporary confidentiality. Please note that a request for temporary confidentiality must be provided in order to hold these external photos temporarily confidential. Please provide such a letter requesting temporary confidentiality.
5. Please note that the confidentiality request letter does not include the operational description. If this exhibit is desired to be held confidential, please include it in the list of exhibits in the request letter.
6. Please note that the internal photos are also located in the test report. If it is decided that the internal photos are desired to be held in temporary confidentiality, you must remove the internal photos from the test report as test reports cannot be held confidential in any form (i.e. it cannot be held in temporary confidentiality nor can it be held in permanent confidentiality status). Only the test setup photos as a separate exhibit can be held in temporary confidential status.
7. Please note that ANSI C63.4 2003 states that for intentional radiator, when the test contains modulation and that modulation in internal (i.e. non-microphone) typical modulation is to be applied (see section 13.1.1.1 of ANSI C63.4). Please explain and please specify the modulation used. Please provide test data in accordance with ANSI C63.4 requirements.
8. FYI – no action needed. Please note that 15.239 also requires that the peak reading of the modulated signal must be less than 20dB over the average limit. While the unmodulated signal is compliant (i.e. peak and average of a CW signal should be the same), and while it should be obvious that a modulated signal would be less than an unmodulated signal, this is an assumption. Please consider providing peak plots of the modulated signal in future reports.

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.