



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

October 24, 2005

RE: FCC ID: PPIRM-70_ATCB002883
Attention: Thomas Reitmayer

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 as this appears to be a Part 15B computer peripheral application as well, testing for part 15B must address this aspect. Please note that there is nothing in the test data that suggests that other than the normal handshaking communication between the device and the PC actual data was being transferred between the devices. ANSI C63.4 testing requirements for computer peripheral devices be operated in the various operating modes. While the GSM transmitting mode was tested, the data transfer mode between the device and the PC does not appear to have been tested. Please explain and please provide information on why this mode was not provided.
2. FYI – please note that your dwell time data is not typical of BT devices. Typically a BT device would have a max dwell of about 300ms+. This inconsistency could be due to the mode of operation selected. As BT devices operate in accordance with the necessary BT protocol, the dwell time is generally accepted as meeting the rules. However, when providing Dwell information please provide the dwell for the maximum mode of operation.
3. Please provide the manual for the device.
4. FYI - Please note that BT frequencies are 2402 to 2480MHz. The IC application form states 2401-2483.5MHz.

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.