American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

November 1, 2001

RE: UTStarcom
FCC ID: O6YUTS-708SY

There are still issues which require clarification on this product.

1. The label location is still an issue. Will it be covering the chipsets? Will the label meet the requirements of 15.925(d), (d)(1), and (d)(2)?

Revised label Information

2. The Exhibit which you define as a Schematic appears to be simply a baseband schematic and is not the RF portion. Please indicate where the PA is on this schematic.

Awaiting Schematic from UTStarcom

3. Your second paragraph to Item #4 does not make sense. What are you trying to say?

The block Diagram is being sent in addition to the schematics just to clarify any layout problems that may arise.

4. Section 7 Plot 7.1 showing 20db BW is performed incorrectly. Plot 7.2 appears to be correct. Please review and change as needed.

Plot 7.1 has been retaken with the spectrum analyzer 99% occupied bandwidth selection. Plot 7.2 remains as the emission bandwidth plot used to determine the emission designator requirement (i.e. –26dB)

5. Radiated Band Edge compliance appears to be set up incorrectly. Since the plots use units of dBm and not dBuV should I assume it is conducted and not radiated? If so, then I would expect the carrier to be only ~10dB from the reference level as shown in Occupied Bandwidth plot 7.2. If this is radiated, then the reference level should still be set up similar to Occupied BW and the display line would be referenced incorrectly.

Units of dBm were used in the reference level to match the EIRP levels the plots were taken radiated.
I have retaken the plots which are almost identical to previous plots; however, I have included an additional plot taken with nothing in the setup changed except the span is 500 kHz, I allowed both plots to sweep through several times >10 at slower than normal sweep time. It is evident that the span of the spectrum analyzer is causing the level to seem lower than ~10 dB from the reference level.

6. Using the information available in the Operational Description, I could not make sense of the on-off duty cycle of this TDMA system. Please send be transmitter timing information. If necessary send zero-span plots of the duty cycle.

Three plots are included showing the zero span of the duty cycle and pulse width, etc.

7. Please note the following language should be included in the Manual.

Revised manual

"In August 1996 the Federal Communications Commission (FCC) of the United States with its action in Report and Order FCC 96-326 adopted an updated safety standard for human exposure to radio frequency electromagnetic energy emitted by FCC regulated transmitters. Those guidelines are consistent with the safety standard previously set by both U.S. and international standards bodies. The design of this phone complies with the FCC guidelines and these international standards. Use only the supplied or an approved antenna. Unauthorized antennas,
modifications, or attachments could impair call quality, damage the phone, or result in violation of FCC regulations. Do not use the phone with a damaged antenna. If a damaged antenna comes into contact with the skin, a minor burn may result. Please contact your local dealer for replacement antenna."

William H. Graff
Examining Engineer
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.