



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

July 23, 2003

RE: FCC ID: KBCIX260MPIRIM902  
Attention: Jon Hughes

I have a few comments on this Application.

1. Please note that while this device has a licensed transmitter, it also has a part 15 intentional radiator. This means that it is a composite device. As such all of the necessary statements of Part 15 must be in the manual and on the device label. The manual does not appear to contain any of these required statements. Since there is ample room on the exterior of the device, please place the 2-condition statement as required by 15.19. Please place the non-modification statement of 15.21 in the manual. Please note that your statement, "Unauthorized antennas, modifications, or attachments could impair call quality, damage the phone, or result in violation of FCC regulations" does not make the required statement. The statement must clearly state and/or imply that unauthorized modification not approved by the party responsible may void the users authority to operate the equipment. Also, please place the 15.105 statement in the manual.
2. Please note that the table for item 6G on page 6 of the Part 15 report contains errors. The last column is labeled "Margin" . However, the number in this column are not the margins but the linear uV/m representation of the EUT measured values of dBuV/m. Please correct the number in the last column to reflect the actual margins or rename the column as appropriate.
3. Please explain why the frequencies the WLAN is operating on for the radiated spurious emissions are not the frequencies listed in the table of low middle and high fundamental frequencies? This seems odd.
4. Please note that the established FCC procedures for measuring the 6dB bandwidth call for a video bandwidth greater than the resolution bandwidth. The 15.247 6dB bandwidth is not taken in an averaging mode (i.e. video bandwidth significantly less than the resolution bandwidth). Please note that the 6dB bandwidth plots provided are not measured in accordance with the FCC procedures. Please note that while the bandwidth appears to meet the requirement, the plots provided show the video bandwidth is 30kHz (less than the 100kHz res bandwidth). Please correct the plots to be in line with the FCC test procedure for DTS devices.
5. Please note that while the device appears compliant for the antenna terminal conducted spurs, the margins listed do not appear to match any measured value for the fundamental. For example, where did you get the 5dBm number for the fundamental with which the spurs appear to be compared? This number does not appear to be in the report. If this is the result of the insertion loss of the filter please explain and show a sample calculation of how this margin was derived.

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.