



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

December 22, 2003

RE: FCC ID: PYAAD-5B_ATCB001004

Attention: Ellis Wu

I have a few comments on this Application.

1. Please note that this device appears to connect directly to the Nokia compatible cell phone. This device also appears to be operable while the cell phone is used by the end user in either the held to the ear or worn on the body configuration. This means that it appears that the device is portable not mobile as you have stated in the operational description. Please provide an operational description that clearly identifies the exposure category of this device. Please also provide a more detailed description of exactly what this device does and how it functions in relation to the cell phone (i.e. how is it used, where is it used - can it be used while the cell phone is held to the ear or is it restricted to the body worn configuration-- if restricted - how is it restricted, etc.?)
2. Please note as this device appears to operate in conjunction with the cell phone (see page 6 of the manual). It is then reasonable to expect that this device is collocated with the cell phone antenna (i.e. the BT antenna is less than 20cm from the cell phone antenna and less than 20cm from the user). As such, it is not known how this device affects the SAR of the cell phone. It is also not known if this device affects the various models differently. Please provide all appropriate SAR information with the cell phone and the BT device operating simultaneously that shows the device does not adversely affect the SAR of the host device. If the device cannot operate simultaneously with the cell phone, please clearly and unambiguously give the detailed explanation.
3. Please note that the setup photos do not clearly show or identify the EUT and how it is connected to the Cell phone. It appears from the photos that you have the EUT connected to a 'test fixture' yet the manual clearly shows the device being capable of connecting directly to the cell phone (page 6 of the manual). Please provide setup photos that clearly identify the EUT and the connection relationship to the other devices. Please clearly explain how this device is used and how it does and does not connect to the phone.
4. If this device was tested in a test fixture, what evidence do you have the connecting the EUT directly to the Cell phone was not worse case?

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.