



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

September 27, 2006

RE: FCC ID: H9PMR400_ATCB004061
Attention: Greg Snyder

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 rf exposure calculations were performed assuming a frequency of 902.75MHz, a power level of 28.45dBm and a gain of 6dBi. However, the test report states that the power measured at 902.75MHz is 29.75dBm and not 28.45dBm. This means that at 902.75MHz the rf exposure calculation at that frequency and power setting would be 22.16cm. The manual states a minimum 23cm separation is needed. Please correct the MPE report to reflect actual power and frequencies used (i.e. please use the minimum 23cm mentioned in the manual).
2. Please note that page 8 and 17 of the test report states the frequency range of the device is 902.75M – 927.25MHz. Please note that the test data on page 14 of the report states the high frequency is 907.75MHz. Please explain and please correct as necessary.
3. FYI – please note that the data tables should clearly identify average vs peak readings. While the limits for average and peak are listed and while the procedure section states that peak and average data is listed, the data table does not declare or clearly indicate what data is for which limit. Please consider clearly identifying average data and peak data.
4. Please note that the non modification statement on page 41 of the manual says, “Any changes or modifications not expressly approved by <OEM>, could void the user’s authority to operate the equipment.” Please note that this does not appear to meet the requirements of 15.21 as the term <OEM> is not clarified nor identified to be the grantee or party responsible for compliance. Please also note that page 36 of the manual repeats the statement but uses Symbol in place of the <OEM>. Please explain and please correct as necessary.
5. Please note that the test report states that the type antenna used during testing is a 6dBi “Panel” antenna. Please note that page 38 of the manual states that the approved antenna is a “Circular polarized” antenna (model AN480). Please note that “panel” type antennae, unless specifically designed with antenna array segments in both horizontal and vertical polarization, are not necessarily considered to have a circular polarization (i.e. radiating both horizontal and vertical polarized patterns). Please explain the relationship between the panel type antenna listed in the report and the circular polarized antenna specified in the manual.
6. Please note that page 40 of the manual clearly states that the device is approved for “mobile” only configurations. Please note that the manual on pages 41 states handheld use and then page 40 states that use is restricted to mobile only. Please explain and please justify how this device with the antenna specified (circular polarized) can be used in a hand held operation and please include information on how the 23 cm separation is met under a condition of hand held operation.
7. Please provide the list of hopping frequencies and how they are pseudo-random.

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.