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

April 29, 2004

RE: FCC ID: O7J-GP0000100C02_ATCB001306
Attention: Ellis Wu

I have a few comments on this Application.

1. Please note that the results in the first table on page 61 of the report (the horizontal 3 meter data) does not agree with the listed values nor with the stated formula provided (i.e. Power Value (dBm = SG Power Value (dBm) + correction Factor (dB). For example, the first result should be -35.12dBm not -48.87dBm as reported. Please provide a report with accurate results and data. Please also note that while the other tables appear to be correct, you should check those for accuracy as well.
2. Please note that the manual does not address the rf exposure requirements. Please provide a manual that contains the proper rf exposure statements.
3. FYI - Please note that as this is a PCMCIA device which plugs into a PC it is also a computer peripheral. However, the manual contains none of the part 15 statements as required by both certification and DoC approval. While this application is strictly for part 24, the manual must still address all rule parts that are applicable. This includes the non-modification statement, and information to the user. This would also include the 2 condition statement required to be on the product itself.
4. Please note that the SAR report section 2.1 reports a maximum SAR of 0.78w/kg, however, note 2 just below the table shows what appears to be three antennae used with the EUT and SAR values produced by those antennae and the EUT. The results in the table of note 2 shows a 1g SAR of 1.41w/kg. Please explain why the 'pretest' data in this table is so much higher. How was the pretest conducted? What power levels were used? Was the EUT the source of power to the antennae or was some other source providing power. If the EUT was the source, please explain why there is so much disagreement between the pretest and test SAR data levels.
5. Please note that system checks must be done within 100MHz of the center frequency of the operating range of the device. 1528 states "The *system check* must be performed using the specified tissue-equivalent liquid and at a chosen fixed frequency that is within ± 10% of the compliance test mid-band frequency." Please note that from the information on pages 23 and 24 of the SAR report it appears that you have used an incorrect tissue solution and incorrect parameters. It appears that the solution and system check was done using a solution and parameters for 2450MHz. As the center frequency of the device is in the 1880MHz range your system validation/check is a full 570MHz removed from the center frequency of the EUT operating band. Also, please note that the conductivity values appear to be far in excess of 5%. Please provide system check data within the required 100MHz of the operating center frequency of the device. Please retest SAR using the appropriate solution and parameters for the 1880MHz range of the device.
6. Please note that until item 5 has been addressed I cannot continue with the SAR report evaluation as the results are not for the proper solution and parameters. Once the SAR issues in item 5 have been addressed, I can continue with the evaluation.

Dennis Ward

Dennis Ward
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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.