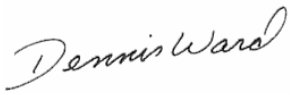
American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

October 20, 2004

RE: FCC ID: BEJRD5330_ATCB001825
Attention: Hyang Sook Yoon

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 provide the following information on the 731 form: Section III Item 2a - Technical Contact information, item 4a – Equipment code (PCE etc) and description of device, item 4b – Rule part for certification, Section IV item 1 – check the yes box for the anti-drug certification, item 2a – name of applicant or agent and title, item 2b,c,d,e – address, phone number, email of agent/applicant.
2. Please provide the tune up procedures for this device.
3. Please provide the operational description (theory of operation) for this device.
4. Please note that PCB layout drawings are not schematics. Please provide the schematics for this device.
5. Please provide the necessary SAR warning statements and SAR levels in the manual as required.
6. Please provide the sample equation used to determine the ERP of the fundamental.
7. Please note that the table for ERP of the fundamental located on page 7 of the report does not agree with your ERP procedure on page 5 of the report. It appears that all you have done is to add the conducted power measured with the power meter to some unspecified factor. This is not the proper method to determine ERP for part 22 devices. Please also note that the procedure states that you used an analyzer, but the data in the table states you used a power meter. Also, the table does not provide the substitution antenna factor or the cable factor. Please provide data in agreement with the accepted antenna substitution method (i.e. include substitution factor, cable factor and formula) and please be consistent in the equipment used. Also, for reference to the SAR report, you will need to leave the conducted power values in the report.
8. Please note that the test procedure on page 10 of the report does not agree with the field strength measurement method performed on page 11 or the report. Please note that the ERP of the spurious emissions is not a field strength measurement (i.e. it is not a measurement of field strength which is subsequently compared to a calculated field strength value), but is an antenna substitution measurement in accordance with TIA603. Please provide the proper antenna substitution method test data. Please show the formula used to account for the substitution antenna and the cable loss.
9. Please note that when measured SAR ERP or conducted power differs from EMC ERP or conducted powers, the SAR power must be the greater. Please note that the ERP in the EMC report is 25.72dBm. Also, please note that it appears that the EMC report indicates that conducted power from the table on page 7 of the EMC report and the conducted power in the SAR report (conducted power indicated on page 19 of the SAR report). The conducted power in the SAR report is 0.16dB less than that in the EMC report. Please remember that power in the SAR report (when there is a difference) must be the greater. Please provide SAR test data that clearly identifies the type of power measured and please test SAR with the same or greater measured power in comparison to the EMC report.
10. Please show/list the separation distances in the setup photos for body worn SAR testing.
11. Please note that the probe calibration lists an uncertainty of 11+%. The uncertainty budget in the SAR report lists the probe uncertainty as 4.8%. Please explain.
12. Please note that tissue verification needs to be done on each separate day of testing. The brain tissue verification is only shown for 10/4. However, head SAR testing was done on 10/7 and 10/6. This is two full days after the head tissue validation was performed. The body tissue verification is only shown for 10/6. However body SAR testing was performed on 10/8, 10/11 and 10/12. Also, the data provided in the files for brain tissue and muscle tissue are dated 10/14; again not the actual test dates. Please explain why the tissue verification for the actual tissue used in the testing has not been reported. Please provide the tissue validation data for the actual days tested.



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.