



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

June 11, 2003

RE: Pioneer Corporation

FCC ID: AJDT101

I have a few comments on this Application.

- 1.) Form 731 calls out an RF Pout of 1413 mW. This is well in excess of the 15.247(b)(3) limits of 1 watt.
- 2.) In general, spectrum analyzers are considered too inaccurate for measurement of RF power output. In addition, the FCC also has concerns about the bandwidth limitations when using peak power sensors. Please repeat the peak RF Pout measurement using appropriate means that are not affected by the bandwidth of the emission. If you need additional assistance, I will be happy to provide guidance in what is considered acceptable technique.
- 3.) The 119.2 dBuV readings given for RF Pout do not match either the Form 731 or the RF Exposure information. This calls again the question of what actually is the RF Pout.
- 4.) FYI: the Spectral Power Density test should be taken over a span of at least 1.5MHz. Please note for future submissions.
- 5.) Can the unit be varied across multiple data rates? If so, will this device show any differences in RF Pout or Spectral Power Density when varied across these data rates?
- 6.) Are there any cautions to the end user about maintaining a distance of 20cm from the antenna while in operation? If so, please indicate where in the Manual it can be found.
- 7.) Please re-do the RF Exposure information calculating for "S" (field density) at 20 cm instead of "R" (distance). This will place this Exhibit in line with current FCC expectations.
- 8.) Was this device tested across three orthogonal planes?

William H. Graff
President and Examining Engineer

[mailto: whgraff@AmericanTCB.com](mailto:whgraff@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.