



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

November 21, 2005

RE: LG Electronics Inc.

FCC ID: BEJGBM700

I have a few comments on the above referenced Application.

- 1) Please provide an operational description exhibit for this device.
- 2) A confidentiality Letter was not provided. Please confirm that confidentiality is not necessary or provide an appropriate cover letter.
- 3) Is final sample label exhibit available. It is preferred that an actual sample label or drawing is provided.
- 4) Time of occupancy currently appears to only support the time of a single pulse. Note that for compliance it must take into consideration that "the average time of occupancy on any channel shall not be greater than 0.4 seconds within a period of 0.4 seconds multiplied by the number of hopping channels employed" (31.6 seconds). Please provide further information to support this.
- 5) Average measurements appear to contain a large delta between peak and average measurements which suggests an incorrect usage of VBW during the test.. Although procedures allow for VBW = 10 Hz to be used for average measurements, please note that this is only allowed if the carrier is on constantly (no pulsing). If the carrier is pulsed, then average measurements must be made with a VBW > 1/Ton pulse time – likely 2.2 kHz or higher for a DH1 mode. Alternatively a mathematical correction can be used for peak to average for the pulse times. Generally for Bluetooth, it is simpler to use a mathematical correction for averaging. Please correct as necessary.
- 6) This device is portable which requires testing in all 3 axis to obtain worse case results according to ANSI C63.4? Please review and correct as necessary.
- 7) Please provide information to support compliance to the 54 and 74 dBuV/m limits at the bandedges of 2390 MHz and 2483.5 MHz.
- 8) The users manual appears to be missing information regarding prohibition against co-location requirement. Please show where this may be located or update the manual to include the following or similar:

The antenna used for this transmitter must not be co-located or operating in conjunction with any other antenna or transmitter.

- 9) FYI...FCC ID cited in the manual is not completed.

Timothy R. Johnson
Examining Engineer

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