

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

October 29, 2003

Attention: William H. Graff
President and Examining Engineer
Subject: Application for CDMA module of Alps Electric Co., Ltd.
ATCB ID: ATCB000802

Dear Mr. Graff,

We have confirmed your comment which received on October 1, 2003.
We completed preparing the new application documents and they have been
already uploaded on your web site.
Please confirm the following matters.

- 1) Please provide missing documents as outlined in my separate email of October 1, 2003.
For your reference, please see 2.1033 (c)
[A1\) We have already uploaded the following documents on your web site following the documents.](#)
[Please confirm new documents on your web site.](#)
[-Parts List](#)
[-Tune up Procedure \(This is included in the Description of modulated systems\)](#)
[-Agent Authorization Letter](#)
[-Modular Request Letter](#)
[-Confidentiality Request Letter](#)
- 2) Please provide voltage and currents in the finals per 2.1033 (c) (8). Ideally this should be a part of the Test Report for all licensed devices.
[A2\) Please discard the previous report and accept the whole new report which is attached below. We measured its electric current and added its data on page 3 of the attached report. Please confirm new documents on your web site.](#)
- 3) Your Form 731 does not list the power requested for this device. Each emission designation should have a requested, measured power. FYI: Since this is an RF category "Mobile" device, just listing the peak conducted RF power for each requested emission will be satisfactory.
[A3\) We made a new application form 731 that mentions to peak conducted RF power. Please confirm new documents on your web site.](#)
- 4) Please provide justification for each requested emission designator using the methods as outlined in Part 2 Subpart C, beginning with 2.201.
[A4\) We made up the statement of reason for your comment, please confirm it on your web site.](#)

- 5) The Users Guide information seems to indicate that the RF Pout can vary significantly, from +23dBm +7/0 for CDMA and +25dBm +2/0. I have concern that this equipment was not tuned up to its maximum RF Pout for testing. Please respond.
[A5\) This test was performed with Maximum Pout mode..](#)
[We altered RF Pout because it was not included suitably in Users Guide.](#)
- 6) Since this device is for a Licensed service, there are protections available to the end user not associated with Unlicensed Part15 transmitters. Therefore the language of 15.19(a)(1) should appear on the device.
[A6\) We prepared a new label including statement of 15 19 \(a\)\(1\).](#)
[Please confirm new documents on your web site.](#)
- 7) I do not understand the data on pages 18 and 19. If this is a conducted measurement, why is antenna gain appearing in the table?
[A7\) The antenna gain is now deleted. Please confirm it on page 22 and 23 of the attached report. Please confirm new documents on your web site.](#)
- 8) FYI: In the future, please make your Occupied Bandwidth plots larger-they are very difficult to read and analyze.
[A8\) We understand your suggestion and carry out its way in the next time.](#)
- 9) It appears that voice modulation (40K0F8W) is adequately presented in analog AMPS mode. However, I see nothing representing wideband data (40K0F1D). It is required that a plot or plots of each requested emission mode be presented for Licensed service.
[A9\) The voice and Wide Band \(data\) were tested. Please confirm these data on page 15 to 19, 29 to 38 and 47 to 51 on your web site. Voice + SAT mode was the worse-case mode \(=it had the worst margin\) so that the measurement has been performed.](#)
- 10) I question the CDMA plots on page 39. They seem to be significantly lower in power than the ones appearing on page 38. Please explain.
[A10\) We retested band edge because we have no reason to get band edge before.](#)

If you have any question, Please don't hesitate to contact us.

Sincerely yours,

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