

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

January 30, 2005

RE: FCC ID: G8JHHI01_ATCB002119

Attention: Kathy Grzovic

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 note that the documentation states that this device is a PCMCIA card that goes into a hand held device. However, as this is a PCMCIA card the possibility exists that the user may put this into a laptop computer. If this device can operate in a laptop computer SAR measurements may be required. Please provide evidence that this device cannot operate in a laptop PC. (i.e. is the device protected by software etc?)

Response: Please refer to the attestation uploaded with this response.

2. Please note that the manual states that the operating frequency of the device is 450 - 460 Hz. This should be MHz. Please correct the manual to reflect the proper operating frequency range of the device.

Response: Please refer to the revised manual exhibit uploaded with this response.

3. Please note that the manual does not appear to address the FCC rf exposure requirements. Please provide a manual that properly addresses the rf exposure requirements of the device. This would necessarily include the mandatory 24cm minimum separation warning and the warning about not collocating the antenna.

Response: Please refer to page 5 of the manual (page 6 of the manual exhibit) for the RF exposure statement.

4. Please note that the report (page 1) states the device is a TNF – Licensed Non-Broadcast Transmitter Held to Face. IF this is in a device that is held to the face and if the transmitter can transmit in that position, it may require SAR as it is over the power in the exclusions list. If the device cannot transmit in the face held position please explain how this is accomplished. Please explain and please verify why SAR is or is not required for this device.

Response: Please excuse the typographical error, and refer to the revised report uploaded with this response.

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.