



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

December 21, 2005

RE: ACCO Brands, Inc

FCC ID: GV333364

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Kindly add the 'Information to User' statement as required by 15.21 to the Manual.
- 2.) Please show all oscillators and their interconnection on the Block Diagram. Remember, FCC is primarily concerned with all RF and signal paths – logic paths are of secondary importance.
- 3.) The Confidentiality Request letter asks for a Parts List (BOM) to be held Confidential. However, no BOM was provided. You cannot ask for confidential treatment of an exhibit which was never supplied. Kindly change your Confidentiality Request letter.
- 4.) Thank you for the label placement drawing. However, artwork or a photograph of the actual label as it is applied to the device is also needed. Please supply at your earliest opportunity.
- 5.) What was the modulating signal used for testing of the device during the 'Emission Band Measurement', Section 4.3 of the Test Report? FYI: In many cases traditionally a sinusoidal audio tone set to the frequency of maximum audio response (not exceeding 15KHz), and at an input level equal to the maximum expected signal level is used for FM systems. For this case, at minimum, some sort of description of the modulating signal used during testing is appropriate. The reasoning is to insure that any high frequency audio signal at high amplitude will not cause this device to violate the 200KHz bandwidth restriction correctly stated in Section 4.3.1 of your Test Report.
- 6.) Your Test Report states that since no AC port is provided, then testing to 15.207 is not required. This is only partially true. My understanding is that the iPod will recharge from a computer using a USB port. This means the combination of 'Pico FM Transmitter, iPod and computer should be tested to insure continuing compliance with the Part 15 limits. Has this testing been performed?

William H. Graff
President and Director of Engineering

[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.