



American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

October 10, 2002

RE: FCC ID: HDCTRC4206

Attention: Gregory M. Snyder / Brian J. Dettling

I have a few comments on this Application.

- 1 The label information does not state where the label will be placed on the device. Please provide a drawing or picture of where the label will be placed on the device.
- 2 Please provide the MPE calculations for this device using the maximum antenna gain defined by the manufacturer.
- 3 Please note that the correct test method for DSSS devices according to the FCC is FCC97114. For antenna terminal conducted tests of Power out, this document states, "Power output. This is an RF conducted test. Use a direct connection between the antenna port of the transmitter and the spectrum analyzer, through suitable attenuation. Set the RBW > 6 dB bandwidth of the emission or use a peak power meter." You have used a signal substitution method. In light of the PPSD tests being performed using a direct connection through attenuation into a power meter, please explain why you have not used the prescribed recommended FCC test method for Peak Power Out of the device. Please note that the use of a CW signal into a power meter may not properly or adequately reflect the power from a DSSS QPSK modulated transmission.
- 4 Please note that the conducted emissions limits in Part 15 have changed since September 9, 2002. The frequency measured is now from 150kHz to 30MHz. If you are still using the older limits, you must attest to 15.37 Transition rules. Please acknowledge that you are aware of this rule change and are applying under 15.37 of the rules.

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.