



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

March 22, 2005

RE: FCC ID: [HQXSAXM105A1](#)

Attention: Yvette Chen

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 you have not included the frequency of the device on the 731 form. Please provide this information on the 731 form.
2. Please note that your request for confidentiality letter is confusing. You state that you are not seeking confidentiality for any exhibits. Why was a request for confidentiality letter provided? If confidentiality is requested for certain exhibits, please provide a request that specifically mentions the exhibits requested to be confidential. Please note that only the following exhibits may be held confidential for this type device: schematics, block diagrams, operational descriptions, parts lists is provided.
3. Please complete section 4a of the 731 (equipment code). The equipment code for this device would probably be DXX. Please clarify.
4. Please provide a more complete block diagram of the transmitter section itself.
5. Please verify that the USB dongle is a receiver only and does not transmit.
6. Please note that the user's manual is not an appropriate operational description. Please provide an adequate operational description that is in accordance with 2.1033 of the FCC rules. Such an operational description must contain, "a brief description of the circuit functions of the device along with a statement describing how the device operates. This statement should contain a description of the ground system and antenna, if any, used with the device." This operational description would describe how the transmitter functions and also describe if the USB dongle is a receive only device etc.
7. Please note that the test setup photos are not in accordance with ANSI C63.42003 (i.e. 10 cm separation distances between devices not met). Please note that as the EUT is the mouse transmitter, it should be tested as a stand alone transmitter. However, when tested as part of a system, then ANSI C63.4 2003 must be followed.
8. Please note that 15.227 is a field strength measurement using an average detector and is not an ERP/EIRP limit. The field strength limit for this type device is 80dBuV/m at 3 meters. Please also note that test report and testing for FCC compliance must be in accordance with ANSI C63.4 2003. Please note that ANSI C63.4 2003 section 10.1.1 (Reports) states, "In addition to this standard, any other standards to which the EUT was tested shall be clearly described in the test report." Please also note that the report provided is a CE compliance report and does not properly address FCC rules and regulations for this device as required by ANSI C63.4. Please also note that it is not possible from the data in the report to determine if the values given as "Reading Data dBm" includes the necessary receive antenna factors, site cable factors or other required factors. Because of this ambiguity and because the CE report is not in accordance with ANSI C63.4 2003 this is not an appropriate FCC compliance report and does clearly show compliance to the required standards and limits. Please provide a report in accordance with FCC part 15.227 and ANSI C63.4 2003. Please include all necessary field strength readings which include all necessary factors and please include a sample formula showing how all factors are accounted for.
9. Please provide a test report which properly addresses 47CFR rules and limits for spurious emissions. Please test the device for compliance to FCC rules.
10. Please provide the schematics for the transmitter as required by 2.1033(a)(5) of the FCC rules.

Dennis Ward

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.