



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

April 23, 2004

RE: FCC ID: LUBBTM-2_ATCB001291

Attention: Bob Cole

I have a few comments on this Application.

1. Please note that you have provided a document stating "Mobile Approval". Do you mean Modular Approval? If so, please provide a request letter that clearly states Modular approval is requested and that addresses all 8 items required by a module. These 8 items are found in the FCC document da001407.
2. Please note that the manual does not appear to contain any of the required FCC statements. Please provide a corrected manual containing the non-modification statement per 15.21, the information to the user statement per 15.105 and the labeling requirement 2-condition statement per 15.19.
3. Please note that the manual does not appear to contain the required instructions about displaying the FCC ID number of the device on the outside of the Host. (i.e. Contains FCC ID: LUBBTM-2). Please correct the manual to provide this required instruction.
4. Please note that the manual does not appear to contain the required rf exposure statement. Please correct the manual to provide this required rf compliance statement.
5. Please note that the radiated setup photos do not clearly show the device being tested in a stand alone configuration. Please provide setup photos that clearly show stand alone configuration.
6. Please note that since this device conducted output is 12.91dBm it cannot be used in any portable configuration if the gain of the antenna is greater than 1dB. This will determine if the module is for mobile only configurations or if the module can be used in either mobile or portable configurations. Please note that no information on the antenna has been provided. Please provide the antenna specifications so a determination as to how and where this device can be used might be made.
7. Please note that section 6.8 of the report states that restricted band measurements were made by conducted antenna terminal methods. Please note that restricted band limits are strictly radiated measurements and cannot be made by conducted methods. They are to be made as part of the radiated emissions measurements. Please also note that from the data provided in the radiated spurious emissions test it is not clear if the restricted bands were considered. Please verify that the restricted bands limits were properly considered and measured during the radiated emissions testing.
8. Please note that section 6.9 (Radiated Spurious Emissions) shows comparison to a limit 10dB lower than the actual limit yet does not clearly state if this is due to the EUT being 1 meter distance. Please verify and explain.
9. Please note that the plot showing the 4.8GHz signal shows that the analyzer was not set to the proper bandwidths for a peak reading (i.e. above 1GHz resolution bandwidth must be at least 1MHz and video bandwidth must be equal to or larger than the resolution bandwidth). Please note that for readings subject to the 54dB average limit there is also a peak limit 20dB higher (74dBuV/M) that also must be met. Please show that when the analyzer is set to the proper resolution and video bandwidths that emissions limits are met for this requirement.
10. Please note that the BlueCore 2 product spec states that the power out of this device is a maximum of 6dBm. Please note that the measured output of this device is 12.9dBm. Please explain. Has anything been done to the BT device to increase the specification power?

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.