

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

March 9, 2001

RE: UTStarcom O6YUTS-EA7T56B

Rachid,

I continue to have much confusion about the power output on this device. Please clarify.

- 1.) Section 6 quotes 1.25W peak. No average power specified.
- 2.) Section 7.2 quotes as high as 5.58W EIRP. What is the antenna gain in dBi?
- 3.) RF Exposure Section 15.3 quotes 80mW average conducted with just a 7dBi gain antenna for average EIRP of 400mW. There is also a reference to just a 5% duty cycle which seems very low for a GSM system. Will this system be capable of using multiple time slots for data transmission, or will it be limited to digitized voice only? RF Exposure Section 15.4 quotes 50mW – what does that relate to at all?
- 4.) Cover page to test report quotes 50mW. Product Description lists 10mW.

In addition:

- 5.) Since there is so many questions about peak or average power, it would be useful to provide a plot of the duty cycle of the device. Show minimum and maximum rates (see item #3. above)
- 6.) Rule 24.238 is intended to be a conducted measurement whenever possible except when if a non-detachable antenna is incorporated into the device. What does the plot of pp. 23 represent?
- 7.) Please confirm the frequency range of this device. It is in my mind highly unlikely that a manufacturer would want only 24.229 Block C 1895 – 1910 MHz. It is usual for the entire 1850 to 1910 MHz subscriber band to be requested. If this is the case, then band edge test data at 1850 should be presented. See 24.238(c).
- 8.) For all band edge data in Part 24, please use only the method described in 24.238(b), and not the marker delta method for Part 15 Spread Spectrum.
- 9.) There is no evidence that the radiated transmitter spurious was carried out to 10 times Fc. Also, please specify measurement bandwidth used – and don't simply quote ANSI C63.4: it was never intended to cover anything outside of IT and low power intentional radiators.
- 10.) It is noted with interest the Manufacturer refers to this as a 200mW unit. This does not match any of the power outputs reported in Items 1 through 4
- 11.) Please add instructions to the manual for installers about maintaining safe distances for compliance with FCC exposure requirements.
- 12.) Internal photographs do not meet the requirements of 2.1033(c)(12). One photo per page please for this complex device.

Please respond in writing to these concerns.

Thanks



William H. Graff
Examining Engineer
President and Director of Engineering

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal pursuant to Section 2.917(c). 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 reply to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must attach your answers to email correspondence.

Reply to the examiner at the email address shown below. 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 e-mail address listed below the name of the sender.