



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

February 20, 2004

RE: FCC ID: OB6-IGRS46D9916_ATCB001131
Attention: Edward Usoskin

I have a few comments on this Application.

1. Please note that the 731 states part 90 and part 15. The technical section of the manual states 15.249. Please be specific as to which rule part to which you wish this device certified. Please explain and please make documentation consistent.
2. Please note that you state the use of ANSI C63.4 as the test method. Please note that for part 90 this is not an appropriate test method (e.g. ANSI C63.4 is for unlicensed part 15 devices only). Please correct the test method and or test to the proper test method.
3. Please explain why conducted emissions to 15.207 were performed. 15.207 is the conducted emissions limits for intentional radiators under part 15.
4. Please note that the conducted emissions plots are far too wide and far to fast to provide adequate information on the compliance of this device. For example, the fundamental emission shows a reading of -67dBm (-37 if 30dB attenuation is applicable) when the actual emissions of the fundamental is far greater. This then leads to the question of compliance on other emissions shown on the plots. Conducted emissions at the antenna terminal needs to be done using a smaller span than provided. Please provide evidence that clearly shows compliance (use smaller spans and possibly longer sweep times to allow the analyzer to capture the actual signal and levels involved). Alternately, please explain and justify why a 700MHz span using a 230ms sweep is a valid and useable analyzer setting for taking appropriate conducted antenna terminal emissions measurements.

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.