



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

December 19, 2005

RE: FCC ID: OWDTR-0022-E_ATCB003028
Attention: Kathy Grzovic

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 part 90.210 states that devices in this range must meet emissions mask B or G. Please note that emissions mask G states, "On any frequency removed from the center of the authorized bandwidth by a displacement frequency (f_d in kHz) of more than 5 kHz, but no more than 10 kHz: At least $83 \log(f_d/5)$ dB; (2) On any frequency removed from the center of the authorized bandwidth by a displacement frequency (f_d in kHz) of more than 10 kHz, but no more than 250 percent of the authorized bandwidth: At least $116 \log(f_d/6.1)$ dB, or $50 + 10 \log(P)$ dB, or 70 dB, whichever is the lesser attenuation; (3) On any frequency removed from the center of the authorized bandwidth by more than 250 percent of the authorized bandwidth: At least $43 + 10 \log(P)$ dB." This means that at 10kHz removed the limit should be 25dBc and at 250% the limit should be about 65dBc. This is not a single liner extrapolation but is actually 2 different slopes. The last slope decreases at $116 \log(f_d/6.1)$ to the point of lesser attenuation (about 65.6dBc) then has a straight limit line to the 250% point. At that point the limit increases to $43 + 10 \log(P)$. Perhaps I am not reading you plot correctly, but it appears that you have applied a single linear extrapolation from 5kHz removed to the lesser attenuation point. I do not believe this actually affects to compliance of the device but the mask does appear to have a minor error. Please explain the derivation of the mask G shown on page 10 of the report (i.e. show the two limits calculations for 10kHz removed and for 250% removed). This comment can be considered FYI but I would appreciate an explanation of your calculations for this mask to verify that it is correct.

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.