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

July 10, 2002

RE: FCC ID: PANBT0002
Attention: Alan Lane

I have a few comments on this Application.

1 The FCC ID label and label location size appear to be large enough to place the ID number and the statement required in 15.19 (2-condition statement). Please provide a sample label with the required ID and statement, or please provide justification under 2.925 as to why the statement of 15.19 is not on the product. xx

2 Channel separation and bandwidth were measured in data mode. However, Bluetooth devices also have an acquisition mode. What is the measured bandwidth and channel separation in this mode? xx

3 Not only must conducted band edge emissions be –20dB below the highest emission level of operating band, they must also meet the restricted band requirements of 15.209 at 3 meters. The spurious emissions tables give no indication that the restricted bands between 2310-2390 GHz and 2483.5-2500 GHz were investigated. Please provide evidence that these two restricted bands were investigated on the OATS 3 meter range and that they are in compliance to 15.205 limits. xx

4 Since this is a limited modular approval and since only two antennas have been tested with this device, the manual needs to state that only those antennas tested in the certification application are authorized. Any other antenna used with the module may require a separate authorization and ID number. xx

5 The report states several model numbers for which the test report applies, but doe not provide information on the differences between these model numbers. Please provide a short description between the model tested and the other model numbers. xx

6 The manual states that this device can be used in a portable Cellular Handsets, Cordless headsets and Personal Digital Assistants (PDAs). While the device power certainly appears low enough to use in portable devices, the report and application for this device specifically states it is for **mobile** device use only. Please correct the manual to reflect the conditions of modular approval. If the device is to be used in portable devices, please retest the transmitter using the antennae that will be allowed to be used with this module in a portable configuration. xx

7 The manual gives a range of power between –2 and +2.5dBm. Please note that the maximum power on any grant is the maximum power measured at the time of testing, not the power specified in the technical documentation or manual. In this case the maximum power is 0.95mW or –0.22dBm. Since power levels cannot be changed by a PC2, this means that any device exceeding this maximum (-0.22dBm) must apply for a separate ID. If the manufacturer wishes to market this device at the +2.5dBm level, then testing must be done at this higher level. Please provide test data showing compliance at the higher power level mentioned in the manual, or please correct the manual to reflect the tested power level. xx

Dennis Ward
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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.