



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

May 3, 2005

RE: FCC ID: PHX-RSU2510F_ATCB002396

Attention: Tim Blom

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. FYI – Please note that as this is a Class B computer peripheral device under DoC as well as a licensed transmitter the 2-condition statement of 15.19(a) must be on the device. Please note that this statement cannot be in the manual as the device is clearly large enough to accommodate the statement. You should consider complying to the specific rule section for this requirement.
2. Please note that 27.50(h)(2) states “Mobile stations are limited to 2.0 watts EIRP. All user stations are limited to 2.0 watts transmitter output power.” While the conducted power has been shown to be less than 2 watts for user stations, the EIRP has not been shown to be less than 2W. Please provide information on the antenna gain of the device and please address the 2 W EIRP limit for mobile stations.
3. Please note that the antenna substitution information provided does not appear to agree with the method specified in TIA603 mentioned or the test procedure specified on page 45 of the report. TIA 603 methods stipulate that the field strength obtained by the receive antenna be reproduced by applying a signal into a substitution antenna. The reading is taken from the output of the signal generator or amp which fed the substitution antenna. The cable factor from the substitution antenna to the generator is then subtracted and the gain of the substitution antenna is added to give the ERP/EIRP. The data shown indicates additional factors are added that do not apply and the report does not explain how or what the substitution factor is or how it was derived. Please explain how the data relates to this accepted method (i.e. that mentioned on page 45 of the report) and why the receive antenna factor, cable, preamp and attenuator factors have been included in the measurement. Please explain how the substitution factor reported is derived and please provide evidence that the method used is a proper antenna substitution method.
4. Please note that the spurious emissions limits for BRS stations is not simply $43+10\log P$ as stated in the report. Please note page test report part 1 page 30 incorrectly quotes 27.53(l)(2). This has changed as of Jan 10, 2005. Please note that 27.53(l)(2) is for fixed stations. Please note that this is a mobile subscriber station and does not fall under this rule part. Please quote and provide appropriate test data for the correct section of 27.53 (i.e. 27.53 (l)(3) and (4)).
5. Please address the emissions limits for this type device as specified in 27.53(l)(3) and (4).

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.