



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

July 29, 2004

RE: Chi Mei Communications Systems, Inc.

FCC ID: QDJ-0406CHAI1

After a review of the submitted information, I have a few comments on the above referenced Application.

Issues Part 22/24:

- 1) The Parts list should be for the RF section. It is not clear if the part is from an OEM manufacturer or the applicant. If the RF section is a purchased OEM part that is different than the applicant, please include a parts list that clearly shows the OEM part manufacturer is different than the applicant for this application. If the RF sections is of the applicants design, a parts list for the RF section (internal to the module) itself must be provided.
- 2) It is uncertain where the antenna for the Part 22/24 is located. Please provide a photograph or label to clarify this.
- 3) The schematics should include the RF circuitry (module). If the RF section is a purchased OEM part that is different than the applicant, please include a parts list that clearly shows the OEM part manufacturer is different than the applicant for this application. If the RF sections is of the applicants design, a schematic of the RF section (internal to the module) itself must be provided.
- 4) Users Manual has not been provided.
- 5) Information in the application supports that the device may also be for use in European bands 900 GSM and 1800 DCS. Please clarify.
- 6) We are also awaiting your determination on how to handle RF exposure conditions.
- 7) Page 59 appears to show a high reading around 881 MHz. Why does this not appear in the data?

Issues Part 15:

- 8) Please explain the derivation of the dwell time results. They appear too low for a 30 second period. Also see attached theory regarding Bluetooth as well.
- 9) Please confirm the output power of the Bluetooth was at a maximum as will be manufactured. Typical results for Bluetooth are normally around 1 – 5 mW. The output of this one appears low. For instance, was the software/firmware set properly?

Issues SAR:

- 10) The SAR report mentions Bluetooth as 6 dBm. The EMC report mentions -3 dBm. This is a 9 dB difference. Please explain. Note that the FCC expects all tests to be tested at maximum power.
- 11) Please confirm the devices maximum GPRS class is 10.
- 12) One of the positioning photos appears to show 2 cm instead of 1.5 cm.
- 13) Page 22 shows 850 MHz validation on 7/6, while the validation plots shows 7/7. Additionally 1900 MHz validation on page 22 is shown as 7/7, but the validation plot shows 7/6. Please explain.

Timothy R. Johnson
Examining Engineer

[mailto: tjohnson@AmericanTCB.com](mailto:tjohnson@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.