



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

April 20, 2004

RE: FCC ID: QVVRH-51_ATCB001283

Attention: Atsuo Taguchi

I have a few comments on this Application.

1. Please note that the schematics are blurred and unreadable. Please provide readable schematics.
2. Please note that there are a number of instances in the EMC report that Part 22 is referenced. As this is only a Part 24 device, please remove references to rule parts that do not apply.
3. Please note that the report states testing was carried out in accordance with ANSI C63.4. Please note that ANSI C63.4 is not an appropriate test method for Part 24 devices. TIA603 on the other hand is the appropriate testing documentation to refer to. Please explain why ANSI C63.4 was referenced as the test method and please correct the report to refer to the proper document.
4. Please note that the EIRP power section of the report does not indicate the method used. As you indicate you used ANSI C63.4 test methods this would also indicate that you used the radiated field strength method of $EIRP = (E_d)^2 / 30G$. This is not the correct method as EIRP must be measured using the antenna substitution method. While the test may have been conducted properly, the test report must also properly report on the actual methods used. Please provide information on how you measured EIRP using the antenna substitution method and please provide a sample of the formula used including substitution antenna gain values and cable loss values. Please show compliance to TIA 603 EIRP methods.
5. The report states radiated spurious emissions was done using the substitution method of 603. The data tables however only show final numbers. Please provide a sample of the formula used in the substitution antenna method including information on the gain of the substitution antenna and cable used.
6. Please provide the resolution and video bandwidths used for the plots on pages 37 to 42 of the Bluetooth transmitter report.
7. Please note that the SAR report states on page 3 that the highest drift was -2.5dBm. The highest recorded power drift in the plotted data is .16dBm. Please explain the difference between the two listed drifts.

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.