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September 11, 2003

RE: ATCB Comments QYPPWA0701

After reviewing your comments, please find our responses below.

1). Photos are not normally held confidential. Justification must be provided to hold photographs as confidential. Justification could include: (1) special tools required to open the case, (2) the circuitry may be potted or covered in epoxy, (3) the company professionally installs the product and it is not directly viewable by the public during use or after use, and (4) the product may involve new technology. Trade secret is not sufficient justification. New technology, if it is documented, can be justification for holding photos as confidential, but for example, a basic FM transmitter is not new technology. Please provide an updated letter of confidentiality that justifies why the antenna photographs should be held as confidential, or as an alternative, you may use a black marker to "black out" the top of any readable components and provide new internal photographs. Please let us know how you wish to proceed with this issue.

The confidentiality request has been updated to remove photographs from its scope.

2) The label states "FCC: QYPPWA0701". Please correct the label to state "FCC ID: QYPWA0701".

The label has been updated and a new file has been uploaded.

3) Please provide higher resolution test configuration photographs if available.

A photograph showing a close-up of the device on the test table has been uploaded. Note that this picture does not show the telephone line connected (although preliminary testing demonstrated that the emissions from the device were not significantly affected by the presence of this cable).

4) Please provide information regarding the RBW and VBW settings used for radiated emissions measurements.

RBW=VBW=1MHz for peak measurements above 1GHz, VBW reduced to 10Hz for average measurements..

5) The test report appears to be missing the following: output power measurements, 20 dB bandwidth, channel occupancy, channel separation, channel dwell time, number of channels, etc. as shown in the previous related report and the summary page of this report. Please provide.

The data was omitted from the report by mistake. The report has been revised to include this data.

6) Given the missing output power in the test report, it is uncertain of the method used. However the power listed on the 731 form is less than 0 dBm, while the chip used in this device appears to have an output of 4 dBm. Additionally, the desired method is to use far field equations to determine a conducted output power. Please explain and/or correct the necessary exhibits.

The output power was measured directly via a connector on the circuit board. The test data has been corrected to include the missing data (refer to (5) above).

7) Given the output power of this device (around 4 dBm) and antenna gain of 6 dBi, the expected output power of this device will exceed 5 mW. However, this device is not really considered a portable device given its design and use, and should be considered as a mobile device. Please correct the RF exposure exhibit for this issue by calculating the power density at 20 cm. Additionally, the users manual should include the typical statements required for mobile devices ("This device and its antenna must not be collocated or operating in conjunction with any other antenna or transmitter").

The output power was measured directly via a connector on the circuit board to be -2.4dBm. The chipset specifications may indicate an output power of ~4dBm but this level was never measured (we did have a couple of units available and the output power was consistent between the units we had). With this in mind is it possible to keep the device listed as a portable device since the output power measured (-2.4dBm) and calculated maximum eirp(3.6dBm) remain below 5mW (7dBm)? This avoids having to enter any rf exposure information in the user's manual.

8) FYI, This certification only covers the TX portion of the device and does not cover any requirements necessary for the telecom portion of the device.

Noted, Part 68 registration is being handled separately.

The following files have been uploaded to the ATCB website to support these responses:

- LABEL AND LABEL LOCATION-revised.pdf
- Close-up.JPG
- Response.doc
- R52139 (revised).pdf

If you have any further questions, please do not hesitate to contact me via doc@elliottlabs.com.

Regards,

A handwritten signature in green ink that reads "Mark Briggs". The signature is written in a cursive style with a large, stylized "M" and "B".

Mark Briggs