



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

July 15, 2005

RE: Pepper Computer Inc.

FCC ID: S5Y1234

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

- 1) Certain items that may be considered confidential (i.e. block diagrams, schematics, other certain technical information) can be requested to be held confidential from the public upon release of the grant of authorization. However a cover letter addressing this must be provided. Note that the 731 and your uploads support that confidentiality is desired on certain exhibits. Please provide an appropriate cover letter. This letter should have an appropriately reference to 47 CFR 0.459. Please see attached as an example.
- 2) The block diagram provided is a system block diagram. However, the block diagram should show the frequencies of all oscillators in the TX device (CFR 2.1033(a)(5)), unless this portion of the device is an OEM part from a different manufacturer. Please provide either the block diagram for the TX portion, or alternatively provide a parts list that shows that this part is provided by another manufacturer. Please update the list of confidential exhibits if necessary.
- 3) The schematics do not include the TX portion of the device. Note that a schematic for the TX portion of the device is required as specified 2.1033(b)(5) for the RF section. Please provide either a schematic for the TX card or as an alternative, you may provide a parts list that lists that shows the details of this part and information showing its from another manufacturer. Please provide either a schematic or parts list as specified. If necessary, please update the confidentiality letter to include the parts list. Note that the FCC really prefers the schematic of the TX itself.
- 4) Internal photos should clearly show close up photographs of the TX portion of the devices as well. It is currently uncertain where these are located. Additionally, the top and bottom of these TX boards, including with and without shields must also be provided. It is also uncertain where the antenna are located in the device, therefore kindly provide an internal photograph labeled as necessary to show the location/positions of these antennas relative to the device.
- 5) Please explain a code of JBC on the 731 form. It appears the computer approval portion of this device is being done under a DoC and is not being certified as a computer. Please clarify.
- 6) The 731 form should site DTS for the WiFi portion of the device in Section III, 4 (a). The Bluetooth should be listed as a DSS. You may place both this information on the same form.
- 7) Please upload test configuration photographs as a separate exhibit as well.
- 8) Test methods listed in various reports mention ANSI C63.4 - 2001. Note that the FCC rules do not reference this but reference a 2003. Please ensure compliance with this version of the standard and update as necessary.
- 9) Please justify use of substitution method for power measurements. The FCC prefers an antenna conducted measurement. Where this can not be done, alternative methods given from the FCC are use a far field equation.
- 10) The device is portable. Therefore all radiated tests should have been performed for each of 3 axis in effort to obtain worse case results. It is not clear if this was done. Additionally, please note that worse case positions for one test does not necessarily justify worse case for another test as well.
- 11) The SA reference provided for the DTS power table does not appear to match the values shown in the plots. Please explain.
- 12) More information should be shown as to how the 54 and 74 dBuV/m limit was met at the bandedge. For instance a sample calculation, correction factors, etc.

- 13) Page 28 of the DTS test report suggests the testing was done with 230 VAC / 50 Hz. Note FCC regulations specify nominal power to be used. Please review/correct as necessary.
- 14) Some average measurements shown in the DTS report show a 3 Hz RBW. Note that the FCC as specified 10 Hz as a minimum. This should be review/corrected as necessary.
- 15) FYI....Frequency Tolerance information on the 731 is not necessary for Part 15 devices. Additionally, the Microprocessor is not necessary if the computer is approved under a DoC.
- 16) FYI....6 dB bandwidth should really be performed with VBW > than RBW. Please consider this in the future.
- 17) FYI....If the TX's can operate simultaneously, intermodulation products should be investigated to ensure compliance (verified) with the rules, although the FCC no longer requires this information to be submitted.
- 18) SAR and Bluetooth Report are still under evaluation.



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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.