



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

November 10, 2004

RE: Xanavi Informatics Corporation

FCC ID: SJ21200U

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

- 1) Please provide a photograph of the bottom of the Bluetooth module with the label removed.
- 2) The font used on the FCC label makes the ID Numbers and statements unreadable. Please use a different font and provide an updated label.
- 3) Please justify the use of the DoC labeling information (FCC Logo). This labeling is reserved for particular approvals that do not appear to apply to this application (PC Peripheral, Stand alone RX, etc.)
- 4) It can not easily be determined if the schematics include the Bluetooth module. If so, please explain where the schematic for the module itself is shown. Note that a schematic for the TX portion of the device is required as specified 2.1033(b)(5) for the RF section. However, if the TX portion of this device is an OEM part, as an alternative, you may provide a parts list that lists that shows that this part is provided by another manufacturer. Please provide either a schematic for the TX or parts list as specified. If a parts list is provided, please clarify if this should be covered by confidentiality.
- 5) Please explain the difference between the configurations shown in test photos 1 versus test photos 2. Please justify how photos in 1 are relevant given there is not any case present.
- 6) The users manual should include the following or similar (as appropriate for this device) statements:
FCC Radiation Exposure Statement
This equipment complies with FCC radiation exposure limits set forth for an uncontrolled environment. This equipment should be installed and operated with minimum distance 20cm between the radiator and your body.
•This transmitter must not be co-located or operating in conjunction with any other antenna or transmitter.
- 7) Please note that the FCC no longer desires that the safe distance for mobile devices be calculated in the RF exposure exhibit if the safe distance is < 20 cm, but instead prefers the power density results to be calculated at 20 cm and compared to the power density limit.
- 8) The 731 form shows 75 mW, while the test report shows 0.75 mW. Which is correct?
- 9) The RF exposure exhibit shows 0.8 dBi gain, while the test report states 9.53 dBi. What is the correct gain. Please correct the test report and/or RF exposure exhibit as necessary.
- 10) Please explain the data on page 51 & 54. All data points appear to be 0.
- 11) FYI.....Peak power density requires a sweep time > (Span/3 kHz). This was not appropriately tested. However, given that the output power itself is < than the 8 dBm limit, retesting is not necessary.
- 12) FYI.....For average emissions on Bluetooth devices, please note that you can take the peak reading and correct by the worst case duty factor per TX frequency. This should be a greater than 20 dB correction factor.

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.