



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

July 6, 2006

RE: Furuno Systems Co., Ltd.

FCC ID: T87SS23BTXXT

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

- 1) One of the block diagrams and operational description shows both Bluetooth and WLAN. Please explain as this application appears to only support Bluetooth. Is this integrated? Is this a user installable module? Is this permanently installed? Is it a previously approved module? Please provide more information in effort to properly ensure the application properly handles the WLAN portion (if applicable).
- 2) For internal photographs, have the top and bottom photographs of all boards been provided? If not, please provide.
- 3) The Bluetooth appears to be a modular Bluetooth board. The top and bottom photographs of this should also be provided as part of the internal photographs.
- 4) The Bluetooth module photographs should also include a photograph with the shield removed as part of the internal photographs. Please provide.
- 5) SAR was provide, but for a configuration involving WLAN. However the application appears to be for BT. Currently SAR has not been reviewed since it is assumed the application is only covered for Bluetooth. Please comment/explain.
- 6) Users manual mentions information for both WLAN and BT. Currently only BT statements have been reviewed. However if both BT and WLAN are applicable and can operate at the same time, then it appears the non-colocation statement should be adjusted to state "other than the Bluetooth and WLAN" covered by the manual (or a similar statement).
- 7) If this device incorporates both BT and WLAN, and the report mentions they do not TX at the same time. Please explain what precludes them from transmitting at the same time. For instance, does the software allow operation at the same time and are the antenna < 20 cm apart. If not, they are not considered co-located. If so, then they are co-located. If co-located, then worse case SAR configuration for WLAN should also include WLAN + BT at the same time. SAR doesn't appear to address this. Please explain.
- 8) The handheld appears to be Class B and also connect to a PC and therefore considered as a PC peripheral. The device does not appear to be DoC approved. Please explain how this device is approved as a PC Peripheral (i.e. DoC'd, Certified, Considered Class A device and therefore verified, etc.). Note that currently the application does not appear to request Certification as a PC peripheral and does not appear to be DoC labeled. Please explain.
- 9) The device can be charged from AC. Please explain if the device can function while charging. Note that if so, then AC emissions would be considered applicable.

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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.