



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

June 19, 2006

RE: Global Elite Electronic Company Ltd

FCC ID: UBOVM5602B

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Please provide a label exhibit for this device.
- 2.) The Manual is missing all appropriate compliance exhibits. Please correct.
- 3.) This device qualifies as a "composite" filing. That means two Grants will be issued – one for the Bluetooth transmitter and a second for the FM transmitter. Please separate the Test Report into a 15.247 Bluetooth and a 15.239 FM personal broadcast band transmitter.
- 4.) Please provide a Block Diagram of both the Bluetooth module and the FM Transmit module. We are not permitted to accept "black boxes". Please tell us what is inside.
- 5.) This device appears to have a USB connection to allow direct connection to a computer. This means that either DoC or Certification as a computer peripheral will apply in addition to the Composite certification you are requesting under 15.247 and 15.239. Please advise.
- 6.) The occupied BW plots shown on pages 43 and 44 of the Test Report show the fundamental emissions of this device centered directly on 88 and 108 MHz respectively. This is clearly a failure because no emissions shall fall outside the 88 to 108 MHz band. This device must be modified in such a way that it is impossible for emissions to ever fall outside of the permitted band. Instructions to the end user are insufficient – no controls are allowed to permit tuning outside of the band.
- 7.) We have no description of the applied modulation in this device. We will need the analog auxiliary input as well as the digital input ports tested. Please describe the applied modulation, levels, etc.
- 8.) The Internal Photographs are too small and too poor in resolution to be useful. The Commission wants photographs that are clear enough to resolve any writing on the PWB artwork. There also appears to be a "daughterboard" on the main assembly that must be removed and photographed as well. Remember, FCC insists that all circuit boards must be presented, top and bottom, with all RF shielding removed. May I suggest larger photographs one to a page?
- 9.) There are several instances when spurious emissions of the FM transmitter are higher than the 88 – 108 MHz band fundamental. This is not permitted. Spurious emissions are never permitted to be higher than the fundamental. Please review.
- 10.) It is not clear that measurements were made to the 10th harmonic for either of these transmitters. Please review.
- 11.) It is not clear that the instrumentation used for measurements to the 10th harmonic are capable of seeing to the 15.205 restricted band limit of 500uV at 3M at 15GHz and above. Please provide a sample calculation showing noise floor of SA at 15GHz using 1MHz RBW, cable loss, antenna correction factors, etc. Prove that sufficient system sensitivity exists at these high frequencies.
- 12.) The EMI test receiver ESCS30 shows a two year cycle between calibrations. Prove the two year calibration interval. Please show appropriate calibration certificate.
- 13.) Bluetooth devices have several "dwell" states which will effect the time of occupancy. Please provide dwell time data for DH1, DH3 and DH5.
- 14.) Please see "Test System Details" on page 8 of your Test Report. This page is remarkable in that there are no details. Kindly describe the equipment (iPod, CD player, etc.) in accordance with the test report recommendations of ANSI C63.4.

- 15.) What is the cable from EUT to car? Is it power? Is it data? Please describe.
- 16.) The Test Setup photographs do not appear to show any of the equipment spoken of in the "Test System Details" section. Please comment.
- 17.) See page 6 of the Test Report. What is the EUT exercise program used during radiated testing?



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President and Director of Engineering

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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.