



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

December 9, 2007

RE: FCC ID: VR4-EM9009_ATCB005728

Attention: Hoosamuddin Bandukwala

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that the request for confidentiality does not include the tune up procedure. Please confirm that the tune up procedure is not confidential or please provide a new request for confidentiality that includes the tune up procedure.
2. Please note that other than use in EUT test setup ANSI C63.4 has no meaning when testing a licensed device. Please explain why C63.4 is being referenced as a test procedure.
3. Please explain what proper FCC approved test procedure was used when testing this device. Please note licensed devices are tested in accordance with TIA603. Please clarify how and where this was used. Please adequately explain each test and how the appropriate test method was used.
4. Please note that radiated spurious emissions for licensed devices is done using the antenna substitution method. Please note that it appears from the report that the only testing done was field strength measurements at 3 meters. Please retest and provide that required radiated spurious emissions test data using the appropriate and approved FCC method from TIS 603 using antenna substitution methods.
5. Please note that the provided exhibit for the tune up does not appear to be the factory tune up but appears to simply be a check list at installation. Please explain and please provide the factory tune up procedure for tuning the device to the rated power and frequency.
6. Please note that in the MPE report you state in one section that the max gain of the antenna is 0dBd; but in another section you state the max gain is 4dBi then in the tune up you state the gain to be 0dBi.. Please correct all appropriate documentation to give the same antenna gain. Please provide a revised MPE report with consistent information. Please clearly identify if this device MPE is addressed at the time of licensing or if the device exposure is addressed at the time of certification. If the MPE is addressed at the time of certification please provide a manual with the expected rf safety information. If this information is in the manual, please point to the page on which it is located.
7. Please list the appropriate frequency tolerance from the report on the 731 form.
8. Please note that you state the measured output power of the device is 85W and that 87.131 is used as reference. Please note that G7D emissions designators are allowed 50W for Airport control tower, 55 W for Aircraft communication and only enough to establish communication for differential GPS. Please explain why this device should be certified as it appears to be 30 watts higher than allowed in direct measured power. Please specify what rule section allows greater power than listed in 87.131 for G7D emissions.
9. Please note that based on the responses to the above, further comments may be issued.

Dennis Ward
<mailto:dward@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.