



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

November 14, 2004

RE: FCC ID: AK8SNCM3W_ATCB001855
Attention: Ivy Chen

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 while you have provided a block diagram of the overall system, you have not provided the required block diagram of the WLAN transmitter itself. Please provide a block diagram of the WLAN that is in accordance with the requirements of 47CFR2.1033. 2.1033 states that this block diagram must include "the frequency of all oscillators in the device. The signal path and frequency shall be indicated at each block. The tuning range(s) and intermediate frequency(ies) shall be indicated at each block."
2. Please provide the schematics for the WLAN transmitter.
3. FYI – Please note that the correct ANSI C63.4 version to use is the 2001 version. The 1992 version of ANSI C63.4 is no longer appropriate. Please use the acceptable ANSI C63.4 revision for showing compliance.
4. FYI - Please note that 15.247 radiated spurious limits are average limits. While the device may be claimed to be compliant by comparing a peak reading to the average limit, it is still the average limit that must be met. For example, on page 4 of Test Report 2 you state that 1845MHz is 20.62 dB under the limit. However, while the peak must meet the 74dB limit, in order to show compliance, you must reference the peak to the average limit. This then means that the reading at 1845MHz is not -20.62dB under the limit but is only -0.62dB under the limit (with no average reading the peak must meet the average limit). The report should show compliance to the correct limit.
5. Please note that on page 17 of Test Report 2 the second column heading says dBV. This would be dBvolts. I believe the column heading should be dBuV/m. Please explain and please correct as necessary.
6. Please note that the readings on page 17 of Test Report 2 you have not shown how you derived the final results for the column labeled "level". Does this reading include any and all transducer factors used in measurement? Are there any unaccounted for factors that were not included. Please also note that 47CFR 2.1033(b)(6) states, "The report shall include sample calculations showing how the measurement results were converted for comparison with the technical requirements." Please explain and please provide the required formula used either by the engineer or by the software calculating the results.
7. Please note that this device is a mobile rf configuration device and as such requires that the user be informed of rf safety precautions. This is done by a compliance statement in the manual that also informs the user that the device is to be installed to keep a minimum separation distance of 20cm between the user and the antenna. Please include an appropriate rf exposure warning statement in the manual.

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.