



December 05, 2005

RE: Dell Computer Corporation

FCC ID: E2KWM3945ABG

[Answers to the ATCB comments on the above referenced Application.](#)

1. Please note that the manual mentions wall or pole mounted high gain antenna(s) which are professionally installed. However, the antenna(s) tested with this device are not considered high gain antenna(s). Please note that only those antenna(s) tested with this device or antenna(s) of the same type with equal or lower gain can be used. Any use of the type antenna mentioned in the manual as ‘wall mount or pole mounted’ high gain antenna(s) is not allowed unless they are tested and shown compliant. Please either remove such notice from the manual or please provide evidence that the rf exposure distances mentioned can be met.

[Per the manufacture, wall or pole mounted high gain antennas will be professionally installed and tested in the future if used.](#)

2. Please note that the manual states, “As a user of these products, you are responsible for ensuring that the products are used only in the countries for which they were intended and for verifying that they are configured with the correct selection of frequency and channel for the country of use.” This indicates that the device frequency may have the possibility of being changed by the end user so that an illegal frequency may be used in the US. Please note that the rules specifically state that a device must be manufactured in such a way that “adjustments of any control that is readily accessible by or intended to be accessible to the user will not cause operation of the device in violation of the regulations.” This includes any software or downloadable drivers (Intel only) that will allow the user to change the frequencies so as to operate the device illegally. Please verify and attest (show evidence) how the user cannot change any ‘readily accessible or intended accessible control’ so as to operate the US version of this device outside allowed US frequencies.

[Refer to “Channel attestation E2KWM3945ABG” exhibit.](#)

3. Please note that as this is a Modular approval the device must be tested in stand alone mode. Please note that the test set up photos do not clearly show this device as being tested in stand alone configuration. Please clearly show where this device is in the radiated and conducted test setup photos.

[Refer to “Photographs – Test Setup – Rev. A” exhibit.](#)

5. Please verify that this device does not have a turbo mode at 5.25GHz.

[This device does not operate in turbo mode on any channel.](#)



AEGIS LABS INC.

6. Please note that IC testing should be done using the most current RSS210 issue 6. While testing may be similar, the references in the specified standards are different. Please address this issue.

For the 2400 – 2483.5 MHz band report the new RSS210 issue 6 is referenced. For 5150 – 5350 MHz band we still reference RSS210 issue 5 because we did not test for DFS and TPC. According to Annex 9 of RSS210 issue 6 we can still use RSS210 issue 5 for this frequency band. See text below from RSS210 issue 6 Annex 9.

Annex 9: Local Area Network Devices

This annex provides standards for licence-exempt local area network (LE-LAN) devices operating in the 5150-5350 MHz and 5470-5825 MHz bands.

Devices operating in the 5250-5350 MHz which do not comply with the provisions in this annex but only with the requirements in RSS-210, Issue 5 will be allowed to be certified until May 1, 2008. After that date, devices operating in this band shall be certified only if they comply with the provisions in this annex.