



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

July 25, 2005

RE: FCC ID: E5MDS-5800-2_ATCB002619
Attention: Juan Martinez

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 as part 15 devices are not channelized licensed devices the frequency on the grant must be the center frequency of the actual upper and lower channels used not the band edges of the operating band. As there is no test report it is not possible to determine the center frequency of the lowest and highest frequency. Please provide 731 forms (both 15.247 and UNII) that correctly identify the frequencies of operation for this device.
2. Please provide a test report for all FCC rule parts to which certification is being sought. Please also include any RSS reference needed for IC.
3. Please note that the manual states that in the 5.7GHz range only a separation distance of 135cm needs to be maintained. However, the MPE calculations clearly show a minimum separation distance of 2.85cm needs to be maintained. Please explain and please correct all documentation as necessary.

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.

Thanks Dave

The report brings up a couple of questions.

1 The report states that copper tape had to be added to the IDU. Yet it does not say if the manufacturer has agreed that this modification will be implemented in all manufactured products.

2 If the IDU is not considered part of the certified product then it cannot be modified to make the system compliant. Please provide something that states the manufacturer is aware of this modification and that it will be implemented.

3 Please note that the band edges for this device in the UNII rule part is 5250MHz and 5350MHz. 5150MHz is not a band edge for this device, but would be the restricted bands of 15.205. In the report (page 63) there is a confusing statement. You state "The relative amplitude, in dBc, was then applied to the average and peak field strength of the intentional signal made on the oats to calculate the field strength of the unintentional signals." Are you applying this dBc of the intentional signal to achieve an average of the spurious signal at the 5150MHz band edge? While this method might be used for the 5250MHz and 5350MHz band edge requirements, as the fundamentals of this device start at 5260MHz, because the restricted band of 4500 - 5150MHz is more than 10MHz away from the closest fundamental, and because this is not a band edge for the device, the delta method may not an appropriate measurement method for the 5150MHz restricted band requirements. Actual peak and average measurements of the spurious emissions may be more appropriate in this restricted band. Please explain.

4 In regards to the same statement in item 3, it is not clear from the report if the restricted band measurements in run 4 page 63 are conducted with delta correction factors making a presumed radiated or if only the fundamental was made on an OATS etc. There appears to be radiated field strength measurement data in other runs, but is it not clear if these readings included the calculations mentioned in item 3. This would not be allowed as restricted band limits must be done on an OATS and do not include any calculations except for the receive antenna, any amp and cables etc. Please explain.

Please also note that test labs should really be following the acceptable FCC test methods for UNII and DTS devices.

Thanks

Dennis Ward

Evaluation Engineer

American TCB

Certification Resource for the Wireless Industry www.atcb.com

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From: Dave Guidotti [mailto:daveg@elliottlabs.com]

Sent: Tuesday, July 26, 2005 8:38 AM

To: Dward ATCB; 'Juan Martinez'; doc@elliottlabs.com

Subject: Re: E5MDS-5800-2 _ATCB002619

Dennis,

The lack of a report was a mistake. I've uploaded the report. We will get to the rest of the comments soon.

At 04:08 PM 7/25/2005 -0700, Dward ATCB wrote:

Hi Juan

Please see comments

Thanks

Dennis Ward

Evaluation Engineer

American TCB

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