



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

March 7, 2003

RE: FCC ID: E5MDS-CW500

Attention: Juan Martinez

I have a few comments on this Application.

1. Please remove the shields on the board in the photo on page 4 (Front side Photo 1 Of 2) of the internal photos for the IDUY. xxx
2. Please note that there is more than sufficient room on the device to include the required 2-condition statement of 15.19 for Part 15 devices. Please note, the device does not meet the requirements needed in 15.19(a)(5) in order to place the statement elsewhere. Consequently it is not an option, but a requirement that this statement MUST be on the device. Please provide a new label or an additional label showing this statement and where it will be placed ON THE DEVICE. xxx
3. The theory of operation states that a particular "Power Management" control is used in the system. Please provide the tune up procedure or other procedures used at the manufacturer to insure that the automatic power control system does not and cannot increase the power of the device above that which is listed on the grant. xxx
4. FYI - Please note that your statement (The ISM band does not restrict antenna gain or EIRP, therefore there is no need to back off transmit power due to excessive antenna gain) is not correct. This only applies to strictly point to point systems. In all other cases a one dB reduction per one dB increase over 6dBi WILL be required when an effective EIRP of 36dBm has occurred. xxx
5. Please note that the diagram in figure 2.1 of the manual and figure 1.1 of the theory of operation and the phrase "consecutive point" clearly indicates that this is NOT a strictly point to point system. Please note that your manual uses the term "consecutive" point. Also please note that your manual does not specify to the user and/or professional installer that this system is strictly a point to point system as required by 15.247(b)(3)(iii). Consequently, the power reduction for levels over 36dBm EIRP applies to the system as shown in that figure. This means that with the 25.1 dBm conducted power and the 23 dBi gain antenna you must reduce the conducted power to that antenna by 12.1dB (i.e. $25.1+23-36=12.1$). Alternately, you must show how your device is a strictly a point to point system. xxx p-t-p
6. Please note that the "FCC Notice, USA" on page 5 of the manual requiring a 1 meter separation disagrees with the caution statement about keeping a 2 meter separation distance in the "RF Energy Health Hazard" statement just above it. Please make the documentation consistent. xxx
7. Please note that your definition of Broadband Level on page 15 of your report is not correct. The ANSI C63.4 and the Accepted FCC definition is, "If the amplitude measured in the quasi-peak mode is at least 6 dB higher than the amplitude measured in the average mode, the level measured in the quasi-peak mode may be reduced by 13 dB before comparing it to the limit." Please note you incorrectly stated that if the average reading is 6dB higher than the peak then a 13dB the signal is broadband and the reduction can be made. This is not correct. Consequently, any measurement to which you have applied this factor must be re-measured and the averaged level must then be compared to the QP level. If a 6dB difference exists between the QP and Averaged reading, then and only then are you allowed to apply the Broadband correction factor. Please provide evidence that you have complied with 15.207 limits. xxx
8. Please note that 15.207 limits for conducted emissions have been changed since October, 2002 to be in line with the limits of CISPR22. While testing to the older limits may still be done until July, 2004, in accordance with the transition rules of 15.37, the grant will specifically mention that sale of the device must cease on or before July, 2005. xxx

Dennis Ward

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.