



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

November 6, 2002

RE: Accton Technology Corporation

FCC ID: HED3CRSHPW796

After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) The block diagram should show the frequencies of all oscillators in the device (CFR 2.1033(a)(5)) not just the transmit channels. Please provide an updated version that includes this information.
- 2) Please explain the purpose of the copper tape to the external part of the unit. How will this be implemented into production models.
- 3) The operational description/RF exposure/Users Manual exhibits explain that the device is to be used with 2.5 cm spacing. The device may be used as a general purpose PCMCIA card in a variety of devices including laptops & PDA's, etc. (some of these devices may be used in the lap or while on the body). Therefore touch position IS considered applicable and the device must be subject to portable exposure conditions (2.5 cm separation distance is NOT considered applicable). Please provide a corrected operational description.
- 4) Please remove the phrase " In order to comply with FCC radio-frequency radiation exposure compliance requirements, a separation distance of at least 2.5 cm (1.0 inch) must be maintained between the antenna of the device and all persons." from the users manual since it is not considered applicable.
- 5) The operational description mentions a modular approval and mobile applications specific to access points, etc. Please explain.
- 6) Maximum power is not listed correctly on page 6 of the test report. This should be 12.70 dBm. Please correct.
- 7) Section 4.6.6 is not calculated for the worse case margin on the low side of the bandedge. Please add these calculations to the report.
- 8) The gain specified in the test report section 4.7 is 0.8 dBi, while the RF exposure lists 0.0 dBi. Which is correct? Please correct the affected exhibits.

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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.