



American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

February 26, 2003

RE: Accton Technology

FCC ID: HED3CRWE820096

I have a few comments on this Application.

- 1.) This equipment appears to be designed for "Professional Installation" and uses standard SMA connectors for it's antennas. Is the Applicant able to specifically identify the distribution channels that will keep this product away from the general consumer? It is appropriate to attest that distribution will not be via mail order or retail sales, but the question let unanswered is how this device will be distributed.
- 2.) This device will qualify as an RF category "Mobile" device with standard separation distance of 20cm. The Manual quotes a separation distance of 1meter. This is not appropriate for indoor use wall mounted devices. Please review and modify.
- 3.) The Manual does not contain language consistent with the requirements of 15.21. Please review.
- 4.) The Declaration of Conformity does not identify a US representative. Since I assume this is being built for 3Com, I believe a US representative should be available. Please review and correct.
- 5.) No Confidentiality Request letter was uploaded. The DoFC appears to have been inadvertently uploaded twice. Please correct.
- 6.) The Block Diagram supplied is a system block diagram. What is also needed is a block diagram referring exclusively to the 802.11b radio.
- 7.) No Schematics were uploaded to AmericanTCB. The documents given were only board level layout drawings and are not acceptable. Please provide circuit diagrams of the device and the 802.11b radio.
- 8.) The Test Setup photographs show this device laying on it's side during radiated emission testing. Since this device is intended for wall installation, it would be appropriate to test this in its normal vertical position. Please review your photographs and recheck your radiated emission tests.
- 9.) Please re-do spectral power density test with a minimumspan of 1.5MHz
- 10.) Band Edge test on page 47 of your Test Report with equipment set to Ch 11 (2462MHz) shows a spurious emission at approximately 2520MHz. Measurements of this spur do not appear in this report. Please check your data.

William H. Graff
President and Examining Engineer

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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.