



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

March 16, 2007

RE: Accton Technology Corporation

FCC ID: HEDSK8178M

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) The FCC in their guidance to TCBS for SAR review requests a tolerance of 5% or less for RF power measurement between the SAR report, the EMC report, and any additional documentation within the filing. If you would refer to the Manual, you will see the specified RF Pout (Appendix A) is assumed to be +16dBm max in 802.11b mode and +12dBm in 802.11g. This is very different from the +21.25dBm (133mW) quoted in the EMC report and the +20.7dBm quoted in the SAR report. The R&S FSP40 quoted in the EMC report has an absolute accuracy of 0.5dB (12%) according to the manufacturer's specifications. Please explain *in detail* how there can be such a discrepancy between the manufacturer's claimed power and what the EMC and SAR laboratory measured. In general, it is impossible to get accuracy better than the measurement instrumentation. Therefore, a spectrum analyzer makes a poor power meter when SAR is involved.
- 2.) FYI: I note the Anritsu RF power meter found in the SAR report is an instrument with sufficient video bandwidth and accuracy to properly measure broadband power for both 802.11b and 802.11g emissions from this device. May I suggest that RMS measurements (or average corrected to RMS) during the period of the data burst be used during testing of this device? The measured SAR values are very low relative to the RF power for a device this small. We might find that the spectrum analyzer is measuring absolute peak power with the RBW/VBW settings used, which may not be repeatable for any Class II PC performed on this product.
- 3.) FYI: EMC reports can never show a higher RF Pout than the SAR report. And Form 731 must show the highest measured RF power from the EMC report.
- 4.) Please note that for Canada there must be agreement between the CN number and the trade name shown on the device. Belkin and Accton cannot both share the same IC: number. For FCC work, it does not matter – only the FCC ID is important. Please refer to RSS-GEN for additional Canada labeling details.
- 5.) The contact person listed at the FCC website is Hsoang Shen Chen but the person listed on the Form 731 and signing all appropriate letters is James Chen. Please provide some form of documentation showing James Chen is permitted to act on behalf of Accton, and correct the contact person at FCC if necessary.
- 6.) The restricted bands for Canada are slightly different than FCC. Please make sure that all spurious emissions meet the Canada restricted band criteria.
- 7.) It is not appropriate for FCC work to have the AC conducted emissions test performed with the charger plugged into an extension cord or strip outlet in series with the LISN. Please see ANSI C63.4.
- 8.) Was this device tested for radiated emissions in three orthogonal planes? Was the earphone cord extended vertically above the EUT to see if radiated emissions were affected? Was radiated emissions also tested with the USB cable connected to a PC?

William H. Graff
President and Director of Engineering

[mailto: whgraff@AmericanTCB.com](mailto:whgraff@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.