



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

August 6, 2008

RE: Accton Technology Corporation

FCC ID: HEDSMC2536WAG2

After a review of the submitted information, I have a few comments on the above referenced Application. Depending on your responses, kindly understand there may be additional comments.

SAR

- 1) Target values given on top of section 8.2.2 still do not match the expected values for 5 GHz. Additionally, please double check calculations for accuracy.
- 2) The measurement of fluids in section 7.1.1 never changes over the course of testing over 2 months according to this section. This is highly unusual as typically this fluctuates daily. Was the correct data input into this section?
- 3) FYI...Please note that FCC procedure dictate to open display to 90 degrees. Photos suggest display was open a bit further than this. Please watch in the future.
- 4) Section 10.2 removes previous data from 5180 – 5320 MHz and adds data from highest channel 5825 MHz. First, the 5180-5320 should be treated separately from 5745 – 5825 MHz. Additionally since results are > 0.8 W/kg for the newly provided data (5825 MHz) and previous data (5320 MHz) both are > 0.8 W/kg, both sets of data should also test low, middle and high channel. Please include both sets of data and ensure low, middle, and high data is included for both bands. See Previous comment 17) for detail as well.
- 5) Section 2)b)ii)3) of <http://fjallfoss.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=20676&switch=P> denotes in note 12 that the separation distance from module to phantom for EUT bottom to phantom should be <= 1.0 cm. This can not be confirmed with the given report. For instance, photos at 10.7.2 should show or define this distance as well. Please review.
- 6) Answers to the following previous questions could not be located:
 - a) Kindly explain how switching diversity was investigated as mentioned under KDB <http://fjallfoss.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=28238&switch=P>. Note this involves investigation of the different TX paths individually (i.e. not active switching but independent path tests).
 - b) It does not appear that information regarding section 2)b)ii) from KDB <http://fjallfoss.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=20676&switch=P> has been presented (i.e. device is moved away from initial position and single point SAR's are compared to initial positions to determine if additional SAR is necessary).
 - c) While fluid parameters are required for center of the band, the FCC generally wants to see them reported for across the band. If this information is available, kindly provide.
- 7) It appears that test reduction was done for the 5180 – 5320 Bottom position. However results are > 0.8 W/kg which require appears to not allow for test reduction as given in <http://fjallfoss.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=20676&switch=P> (see section 1e).

Timothy R. Johnson
Examining Engineer

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