



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

September 2, 2003

RE: Proxim Corporation

FCC ID: HZB-C38WCW

I have a few comments on this Application. I recognize this is a very complex Application, and I wish to be certain that every item is covered in detail and to the satisfaction of the Commission

- 1.) Please refer to my comments of August 25, 2003. There are several items which are not satisfactory addressed. Please note that devices which operate in the 5.15 – 5.25 GHz band are limited to indoor usage and required to have integral antennas [see 15.407(d) and (e)]. If this product is designed for installation by anyone, I do not see how the neither the indoor usage requirements nor the integral antenna requirements of 15.407 will be guaranteed. Simply adding a comment to the Manual indicating that use in the 5.15-5.25 GHz band is restricted to indoor use is not considered satisfactory. Professional installation may be a way to resolve this, but I see no indication that professional installation is required anywhere in this Application.
- 2.) In addition many of the antenna connectors appear to show “N” style connections which violate the provisions of 15.203. Again, this might be resolved by professional installation, but nothing in this Application to indicate.
  - a. **NOTE: If professional installation is required then an attestation from the Applicant is required to show how this is will be marketed.**
- 3.) The RF Exposure exhibit makes no sense. How does the “Output Power to Antenna” vary from 15 to 109mW when making conducted measurements on the same 2462MHz frequency? Why does the RF Pout in this Exhibit not match the Test Report? It may be prudent to make a table for each antenna showing the Pout for three frequencies, the antenna gain, and the calculated field density.
- 4.) The Section 2, Summary of Test Results in the Test Report is confusing. There is a label at the top of the page on pp. 9 and 10 indicating results applied to Part 15E and 15.247. Is this product to be considered a UNII in the 5GHz low band and DTS in the 5GHz high-band?
- 5.) Why does the power output vary from approximately +10 to +20dBm in 4.4.6 through 4.4.15, and 5.9.6 through 5.9.7? Are measurements made at the connector or at the end of the antenna coax? If at the end of the coax then the cable type and length must be specified. If instead measurements are made with a bandwidth limited sensor then they must be repeated. Please review. Correct Form 731 if necessary.
- 6.) There appears to be a mixing of the RF Pout measurement techniques in the 5GHz band. High band 5GHz devices should use the DTS measurement technique (diode detector/signal generation substitution method) and not the UNII measurement technique. Please review and correct Form 731 if necessary.

Regards,

William H. Graff

President and Examining Engineer

[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.