

Date : 2006/09/07

To: Federal Communication Commission

From: ZyXEL Communications Corporation

To whom it may concern:

Please see our response below:

1) Op desc does not appear to be in accordance with 2.1033(b)(4) and OET/Lab filing guidance, i.e.,

Exhibits - Operational description:

- Operational or technical description regarding how the device operates, is modulated and meets requirements.
- Describe the EUT completely. What is it? (in plain English as well as in technical terms). Give functional description.
- The User Manual is not a substitute for the Operational Description.
- Always describe the transmit frequencies and signals such as modulation type, pulse repetition rate, signal type, information being sent.

Please revise filing where appropriate.

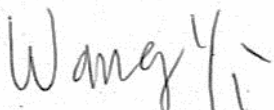
Response: We've modified Op description to include more info as requested, please see revised Op description uploaded.

2) User manual shows "5.15 ~ 5.725GHz" - this does not seem to agree with Form731 listed freqs. Note this also appears to include 5.47-5.725 GHz 15E DFS freqs. Please summarize device operating freqs and output powers, and revise user manual and other exhibits where appropriate.

If device includes 5.47-5.725 GHz operations, please revise test report and SAR exhibits accordingly.

Response: As documented on page 74 of user's manual, 5.47 to 5.725GHz band is for EU model only and is not available for US model.

Sincerely yours,



Yi Wang
EMC/Safety Engineering Section
ZyXEL Communications Corporation