



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

July 5, 2006

RE: ZyXEL Communications Corporation

FCC ID: I88G120

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

- 1.) There are no calibration certificates for the SAR probes or for the validation dipoles. Please provide. Please also note that FCC interpretations require a yearly calibration of all SAR probes unless the manufacturer provides a signed letter indicating another calibration cycle is allowed.
- 2.) Section 2.4.1 of the SAR report appears to have used head medium for validation tests. This is incorrect. All PCMCIA form factor cards with integral antennas will use body SAR. Please be sure body medium was used for all tests / validations.
- 3.) Please refer to the uncertainty budget. It appears very unusual for axial isotropy = 0. Please review and correct.
- 4.) The highest SAR measurements results of Section 1 are not in agreement with the test results from any of the three notebook computers. Have I misread something?
- 5.) The Manual does not contain the highest SAR values measured. Please correct.
- 6.) The band edge testing does not appear to conform to the FCC measurement guidance procedure. Please review and correct test report.

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.