



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

August 2, 2007

RE: ZyXEL Communications Corp

FCC ID: I88MAX100

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

- 1.) Please correct the application form 731 to show all information required for all Licensed radio transmitter devices. This will include frequency tolerance and emission designator. Please also indicate if the requested output power is radiated or conducted.
- 2.) Please provide better and clearer internal photographs. It should be possible to read the designators written on the cases of the integrated circuits.
- 3.) The SAR report does not include any of the required Z-axis plots. Please review.
- 4.) The calibration certificate includes probe correction values for 2600 MHz that were created by extrapolation. We are checking with FCC to confirm if this is a valid methodology.
- 5.) The label shows a DoC logo. Where was this device tested for Part 15B compliance?
- 6.) The test report for Section 6, Table 2 does not appear to have been performed using the substitution method required by FCC and described in TIA/EIA 603. Please expand your measurement table of harmonic emissions to include antenna correction factors, cable loss, generator output level, etc. In addition, if a narrowband CW generator is used, please show how corrections between narrowband and broadband emissions are performed for both your 5 and 10 MHz bandwidths.
- 7.) Please provide voltage and current through the final power amplification elements as required by FCC rules.
- 8.) Please provide all required frequency stability data.
- 9.) Please provide written justification for all emission designators.
- 10.) FYI: Please note the tune up procedure specified by the Applicant specifies the power at 23dBm +/- 0.5dB. Please look carefully at all instances of conducted power before I begin my final review. You are reminded that conducted RF power is still the simplest and best way to compare RF power seen in the EMC report with RF power seen in the SAR report.

William H. Graff  
President and Director of Engineering

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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.