



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

October 7, 2006

RE: Belkin Corporation

FCC ID: K7SF5D8051

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.

- 1) Section 15.15(b) prohibits adjustments of any control by the user that will cause operation of a device in violation of the regulations. Accordingly, any proposal to allow the end user to choose extended channels on frequencies outside of an allowable frequency band in the USA is not acceptable. For example, a WLAN device operating according to Section 15.247 on channels 1-11 between 2.4 - 2.483.5 GHz must not have any user controls or software to allow the device to operate on channels 12 and 13 which are outside of the allowed USA band. For instance, the user should not be able to select alternative countries which would allow different channel plans outside of the allowed USA band. Please explain how this device is compliant to this requirement.
- 2) Page 30 of the users manual mentions a 20 cm statement. Please note that USB pen like devices are considered as portable and therefore 20 cm statements are not accurate. Please review/correct as necessary.
- 3) Give the approval under 15.247, the users manual should state the following or similar:

“The antenna(s) used for this transmitter must not be co-located or operating in conjunction with any other antenna or transmitter.”

- 4) What is the reference to MIMO + CB mode? This needs to be understood at affects the waveform. Please clarify.
- 5) Section 7 of the report mentions power meter, but it doesn't appear correct. Additionally, please confirm if power measured was peak or average.

SAR report

- 6) SAR report should contain a statement of compliance to 2.1093. This was not found.
- 7) Plots should show an outline of the device showing placement of the device relative to the results. Please review/correct.
- 8) It is uncertain if the Z-axis plots are for the worse case positions. Please review/confirm.
- 9) Test report should define if the sample is a production unit or identical prototype (47 CFR §2.908)?
- 10) Report does not appear to document the following information:
 - a) Descriptions of extrapolation procedures used to estimate SAR values adjacent to phantom surface (unreachable due to probe case and boundary effects)
 - b) Descriptions of within-cube interpolation procedures to get 1 mm or 2 mm SAR grid
 - c) Description of averaging (integration) procedures to get 1-g SAR from final interpolated grid
- 11) Test dates should normally be on each plot. It can not be determined if all data was taken on the same day or not.
- 12) What was the test location. Report does not report this.

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.