Elliott Laboratories Inc. 684 West Maude Avenue 408-245-7800 Phone
www.elliottlabs.com Sunnyvale, CA 94086-3518 408-245-3499 Fax

RE: D Link Corporation
FCC ID: KA22001120011-1

1) The FCC ID specified on the label and the test report does not match the ID given on the 731 form. Please comment on which ID is to be used and correct the appropriate paperwork.

The correct ID is KA22001120011-1. The Form 731 has been amended appropriately.

2) The device is listed as Class B regarding digital device emissions, however page 4 of 61 states that measurements from 30 - 1000 MHz were made at 10 meters. Please comment.

The Class B tests were performed at 3m. The test data has been revised to correct the mistake. The revised report and associated data have been uploaded.

3) The theory of operation states that the EUT uses 8 channels between 5180-5320, while the sales literature states 11 channels. Please explain.

Literature has been revised to reflect only 8 channels for US and Canada.

4) The EUT seems to have much less power (almost 10 dB) than the level output by the PA (specified in the theory of operation). Please comment.

The PA is capable of much more power. At the higher power levels the band-edge and harmonics no longer meet the FCC's rules. The power limitation is due, therefore, to the FCC's requirements rather than the limitations of the PA.

Taken out from the Revised Theory of Operation (Section 2.7): **The PA has 29.5dB nominal gain and maximum output power of 22.5dBm.Due to the highly linearity restrict of the high level modulation scheme, The PA normally operating on a linearity region of 10 to17 dBm output power, This device draws about 180mA when enabled by the XPAA signal**.

5) Please show where the statements "Radio Frequency interference requirements: The device is restricted to indoor use only. FCC requires this product to be used indoors due to its operation in the frequency range 5.15 to 5.25 GHz." may be found in the manual.

The User's Manual has been updated to include this statement. The revised manual has been uploaded. The statement's can be found on page 7 of 136.

6) It appears in the manual that the software allows a pull down menu to program the unit for use on different frequency sets for U.S., Canada, and Japan. This control capability should normally not be given to the end user if it will cause the radio to transmit on frequencies not authorized in the U.S. The FCC has recently stated in a Report and Order regarding software defined radios that the manufacturer will be held responsible for keeping the integrity of its programming intact. If the device could be hacked or programmed in an unauthorized manner, the responsibility for such action would rest with the manufacturer, and the FCC would go to the manufacturer for fines or forfeiture actions if either action were necessary. The FCC has further explained to TCBs to also apply the philosophy of the R&O with regard to protecting multiple-capable programming and existing devices that they are approving (not just software defined radios). Please comment.

This control capability will not be available to the end-user and will be removed form the manual. Old manual had Chapter 9 for Country selection. This has been removed on the revised user manual.

7) Given that the highest power actually occurs on the center channel (5250 MHz) and not limited to the 5150-5250 or 5250-5350 band, the grant will be listed as 5210 MHz - 5290 MHz @ 28 mW & 5180 MHz - 5320MHz @ 21 mW. Please adjust the 731 form to match.

Form 731 has been revised an uploaded to the ATCB web site..

8) The test report shows several margins of 0.1 dB for both radiated and PSD tests. Is D Link Corporation comfortable with this margin?

D-Link Letter of acceptance has been uploaded

9) Under antenna requirements (page 8 of 18) the report states 15.15 - 15.25 GHz which is not correct. The power spectral density on the summary page (page 5 of 18) for turbo does not match test report page 10 of 61 (is missing the negative sign). The plot on page 56 of 61 states 54.0 dB for the average measurement, while the note states 50.3 dB. Please correct these errors to ensure consistency in the report.

The corrections have been made and revised report uploaded to the ATCB web site.

Hopefully this answers all of your questions. Please contact me via doc@elliottlabs.com if you require more information.

Regards,

Mark Briggs

Director of Engineering