



# American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

July 19, 2007

RE: FCC ID: KQ9VIB-999\_ATCB005148

Attention: Michael Xie

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that while a block diagram of the system has been provided the block diagram required is that of the WLAN transmitter itself. Please provide the block diagram for this transmitter.
2. FYI – Please note that unless this device is also a computer peripheral device or one of the other devices under which a DoC is allowed the use of the FCC logo is improper and violates FCC regulations. This situation should be addressed.
3. Please provide the schematics for the WLAN transmitter itself.
4. Please note that the test report for the WLAN device states that final testing between 30MHz to 1GHz was performed on an OATS site (see page 9 of the report). Please note that the same report clearly indicates that final emissions measurements between 1-25GHz was performed in an anechoic chamber. Please note that while preliminary measurements may be done in an anechoic chamber, this is not an acceptable test method for final emissions data. All final testing of Part 15 devices must be done on an OATS or semi anechoic chamber meeting ANSI C63.4 NSA requirements. It appears that the module was improperly certified for the following reasons. Please note that the test setup photos for the WLAN device (WLAN Test Setup Photo -4.bmp, WLAN Test Setup Photo -5.bmp and WLAN Test Setup Photo -6.bmp) used in the original certification all appear to indicate that testing was not performed on an OATS nor in a semi anechoic chamber meeting NSA requirements, but was tested in a semi-anechoic chamber with absorbers on the floor between the WLAN and the receive antenna. Please note that this is not an acceptable test method for 47CFR Part 15 devices. Please note that as you are seeking certification for your product you will have to provide appropriately correct data showing testing was performed properly in accordance with the FCC rules and requirements. Please re-test in accordance with acceptable test methods approved by the FCC.
5. FYI – In conjunction with item 4 above please note that while the module may or may not be approved separately as a modular approval, the application is for a different FCC ID number. Please note that the test report UniTe test report- 2347TR2.pdf states “The manufacturer has stated that this is a bought in and is approved to the required standards. The emissions tests performed for this report do not cover the radio type approval/type testing of the wireless module.” Please note that while the unintentional radiator portion of this device may be Class A, the intentional radiator portion of this device must meet the limits of 15.209 (basically Class B). Also, please note that as this is not a modular approval and as a separate FCC ID is being sought, radiated emissions testing of the WLAN device should be performed in the host unit in its associated location with the other circuitry to 15.209 limits. Please consider this aspect of the product.
6. Please note that the test report for the WLAN only appears to contain radiated test data. Please provide the following required test data: 6dB band width plots, Power output, Power Spectral Density plots, Band Edge plots and conducted emissions data.
7. Please note that further comments may result depending on the resolution of the above items.

*Dennis Ward*

Dennis Ward  
<mailto:dward@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.