



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

November 25, 2003

RE: Z-COM Inc.

FCC ID: M4Y-OXG350

I have a few comments on the above referenced Application.

General Items

1) The phrases "FOR HOME OR OFFICE USE" and "Tested to Comply with FCC Standards" are not required to be on the label due to the devices size. However, this information should be in the users manual (15.19(b)(3). Please correct the users manual to include this.

1) EMC Report

2) Please explain why certain radiated spurious emissions > 1 GHz in the tables are significantly below the ground floor levels specified below the tables.

3) SAR Report

3) Please comment on if the scan procedures given on page 15 for the SAR system validation also apply to the general scan procedures for the test scans.

4) The maximum conducted output of this device was measured as 19.73 dBm and the EUT also contains a +2 dBi gain antenna (conducted = 94 mW, EIRP = 149 mW). The FCC has stipulated that PCMCIA cards with conducted or EIRP output power in excess of 100 mW must be tested in 3 typical units for each approved hosts. Please refer to attachment.

5) The final test plots do not appear to show the actual measured SAR values. Please explain.

6) The test report should contain the composition, ingredients, and amounts for tissue liquid listed.

7) Please comment on if the first 2 measurements points in a direction perpendicular to the surface of the phantom during the zoom scan and closest to the phantom surface, were within 1 cm of the surface.

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Examining Engineer

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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.