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

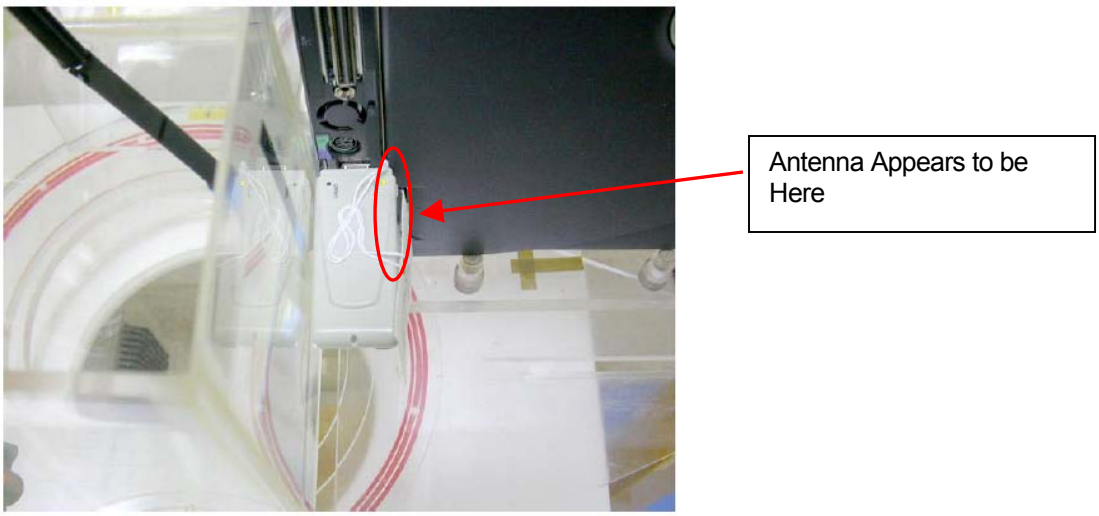
November 12, 2003

RE: AboCom System, Inc.

FCC ID: MQ4WBD512

After a review of the submitted information, I have a few comments on the above referenced Application.

1) It appears that the difference between the WUB1600 & WBD512 is that the daughter board is present in only one version. Please comment. Because of the fact that SAR is not necessarily based on power alone, but that nearby metallic objects affect SAR results due to variances in coupling and surface currents, both of these models should have at least been pretested for SAR in order to determine worse case. Justification on conducted power measurements alone is not sufficient.
2) Additionally, careful examination of the test photographs, internal photographs, and external photographs for SAR suggests that the configuration with the bottom side of the laptop facing positions the device such that the antenna is on the opposite side of the device from the phantom. Due to variances in laptops, etc, The side with the antenna should have been positioned against the phantom. Additional data should be taken.



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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.