



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

March 22, 2004

RE: FCC ID: NIT-SCWI211B  
Attention: Daniel Lee

I have a few comments on this Application.

1. Please note that block diagrams must be in accordance with 2.1033 of CFR47. Please note that this includes listing the clocks, crystals and data paths. The block diagram provided does not have the crystal frequencies shown. Please provide a block diagram showing the appropriate frequencies of the device as required by 2.1033.
2. Please provide a manual with all of the appropriate FCC statements. These include the 2-condition statement required in 15.19, the information to user (non-modification) statement required in 15.19 and the class B statement of 15.105.
3. Please provide the rf exposure statement in the manual. As this device is less than 25mW, the statement only needs to state the device is compliant to the FCC RF exposure limits of OET65C.
4. Please note that in the table of results on page 14 for PPSD you state that you have an antenna gain of 1.5dB. Please note that the procedure indicates that you measured the PPSD at the antenna terminal. Please explain why the antenna gain is mentioned.
5. Please clearly identify the frequencies for each of the readings in the table on page15. What measured value goes with which frequency?
6. Please note that on page 16 of the report you state that you applied an external attenuator to the system then connected the device to the input of an analyzer. Please note that you did not provide the value of attenuator used nor did you clearly indicate that the attenuation was considered in the measurement results (i.e. there is no indication in the table that you added the attenuator to the final measured results). Please verify that the results in the table on page 16 are the results from the plots showing the attenuators used.
7. Please note that in the table of results on page 16 for Conducted Power you state that you have an antenna gain of 1.5dB. Please note that the procedure indicates that you measured the Conducted Power at the antenna terminal. Please explain why the antenna gain is mentioned.
8. Please note that the report states that the measured conducted antenna terminal power is 11.4dBm (13.8mW). The report states on pages 29, 31 and 35 that the measured radiated emissions of the device are only 91dBuV/m at 3 meters. Please also note that you state the gain of the antenna in the system is 1.5dBi. Please note that the conducted power and the calculated power of the device (EIRP) should be within 2 to 4dB of each other. Please note that the max measured conducted power is 11.4 and yet the max calculated EIRP ( $P=(ED)^2 / 30G$ ) from the radiated data is only 0.3mw (-5dBm). Please explain why the estimated radiated field strength is more than 10dB different than the measured power at the antenna terminal. (i.e. orientation of USB, max emissions in a different orthogonal plane than measured, etc).

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.