



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

August 22, 2004

RE: FCC ID: NKRDRUZ\_ATCB001604

Attention: Jerry Chiou / Daphne Liu

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 this is a USB dongle and as such is a portable device that can be used within 2.5cm of the body. As such and because it exceeds the rf exposure limit specified on the exclusions list it must have SAR testing performed. Please provide a SAR report for this device.
2. Please note that your product specification and page 39 of the manual calls this device a UNII device operating in the 2412 to 2484MHz range. Please note that UNII devices only operate under 15.407 of the FCC rules. This is a Digital Transmission system operating under 15.247 not 15.407 of the rules. Please also note that the device cannot operate above 2483.5MHz. Please provide a product specification that gives accurate information on the device.
3. Please note that as this is a USB dongle it is a portable device that is used within 2.5cm of the body. As such the statement requiring 20cm separation shown on page 3 of the manual is not appropriate. Please also note that as this device exceed the power limits specified in the FCC exclusions list it requires SAR testing and subsequent inclusion in the manual of the appropriate SAR warning statements. Please provide a manual with the appropriate SAR warning statement.
4. Please note that page 33 of the manual states that the country of usage can be selected. Please note that the FCC has stated that a device operating in the 15.247 rule part cannot have user selectable frequency ranges. This means that for devices sold in the US no such capability or functionality is allowed. Please remove any possibility of the user from selecting the country of usage and please explain how this capability and feature has been permanently disabled in devices sold in the US.

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.