

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

January 27, 2005

RE: SerComm Corporation

FCC ID: P27CB801M

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) The Manual is confusing: Although it states that only Ch 1-11 are for use in North America, it leaves open the possibility that when infrastructure mode, transmitting outside of the permitted channel set may be possible. This is not permitted no mater how brief and should be addressed. Would this device ever possibly transmit on channels 12 or 13 in North America?
- The SAR value quoted in the Manual does not match the measured value in the SAR report. Please correct.
- 3.) The Test Report in Section 1.11 identifies 20cm as the separation distance to be used by the end user from this device. This is not appropriate since a SAR report has also been submitted for evaluation. Kindly address.

William H. Graff

President and Director of Engineering

mailto: whgraff@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.