



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

August 9, 2005

RE: SerComm Corporation

FCC ID: P27IP906SM

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

- 1) Section 15.15(b) prohibits adjustments of any control by the user that will cause operation of a device in violation of the regulations. Accordingly, any proposal to allow the end user to choose extended channels on frequencies outside of an allowable frequency band in the USA is not acceptable. For example, a WLAN device operating according to Section 15.247 on channels 1-11 between 2.4 - 2.483.5 GHz must not have any user controls or software to allow the device to operate on channels 12 and 13 which are outside of the allowed USA band. For instance, the user should not be able to select alternative countries which would allow different channel plans outside of the allowed USA band. Please explain how this device is compliant to this requirement.
- 2) Test equipment for 5 GHz report section 5.4 does not appear to support measurements up to 40 GHz. For example, what amplifiers or other device were used in the range above 26.5 GHz. How was effective dynamic range achieved for higher frequency measurements (closer distances, etc.). It appears that only the antenna and spectrum analyzer may have operated in the proper ranges, but given the gain of the antennas, how can proper dynamic range for measurements be achieved? Please review.
- 3) Information regarding compliance to 15.407(c) could not be located in the application. Please provide.
- 4) Why does the power measurements between sections 6.3 and 12.3 differ for the high 5 GHz band. The method for UNII and DTS power measurement method 3 is the same (see attachments). Please review/explain/correct as necessary.
- 5) FYI....The 731 form still does not list actual tunable frequencies for 5 GHz frequencies. Please correct this on future applications.

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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.