



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

September 24, 2004

RE: SerComm Corporation

FCC ID: P27UB801R

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

- 1.) Kindly provide clearer and better Test Setup photos. It is impossible to tell from the supplied photos if the Test Setup is correct. Moreover, it appears that a complete "system" was not tested during Part 15B testing. Please refer to ANSI C63.4 for complete instructions as to how a computing equipment setup must be configured. It is always expected that complete system will be tested – please confirm you're radiated and powerline conducted data. ok
- 2.) Please remove the 20cm statement from the Manual. Since this device is tested for SAR compliance this statement is redundant and not necessary. In it's place could go a statement indicating the highest SAR value found for this device.
- 3.) The z-axis SAR plots appear unusual. My expectation is that a smooth logarithmic curve would be produced. This is not the case. My initial suspicions are that the liquid in the phantom may not have had the required minimum depth. Please review and comment.
- 4.) Your SAR data indicates a power sag of -0.7 dB using 802.11b in the high channel. This is excessive. Kindly review your results. A power sag during SAR testing ideally should not exceed 5%. Please review your procedure.

William H. Graff
President and Director of Engineering

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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.