



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

July 17, 2002

RE: FCC ID: P6G-WLERFA
Attention: Kathy Grzovic

I have a few comments on this Application. This is a BIG SHOW STOPPER.

- 1 Part 15.204 (External radio frequency power amplifiers and antenna modifications.) states: “(a) Except as otherwise described in paragraph (b) of this section, no person shall use, manufacture, sell or lease, offer for sale or lease (including advertising for sale or lease), or import, ship, or distribute for the purpose of selling or leasing, any external radio frequency power amplifier or amplifier kit intended for use with a Part 15 intentional radiator. (b) A transmission system consisting of an intentional radiator, an external radio frequency power amplifier, and an antenna, may be authorized, marketed and used under this part. **However, when a transmission system is authorized as a system, it must always be marketed as a complete system and must always be used in the configuration in which it was authorized. An external radio frequency power amplifier shall be marketed only in the system configuration with which the amplifier is authorized and shall not be marketed as a separate product.** (c) Only the antenna with which an intentional radiator is authorized may be used with the intentional radiator.”

Please note that the report says this is “an original application for Certification on the WLAN card with amplifier, DC power injector, and cabling, M/N: NGIT Fixed Site Extended Range (Amplified) WLAN , FCC ID: P6G-WLERFA.. However, the Letter of authorization, the technical description and other Northrop documentation calls it an “Extended range (Amplified) Wireless LAN Antenna Kit.” The technical description also states that it is an external radio frequency **(RF) power amplifier and fixed site antenna kit** for use as a system component. Even the manual appears to support the idea that this “kit” is an amplifier that is intended to be added to the specified system (Cisco Aironet 350), but not initially sold as part of that system. Such a “kit” is not allowed for any part 15 device. Again, the kit would have to be sold as part of the entire system at the time of purchase and in no way as an after market ‘kit’ sold separately. As such the ‘kit’ would not be allowed its own ID number but would be sold under the System FCC ID number instead. The ID must apply to the system and not just the kit.

However, the FCC does allow separate ID numbers for ‘Boosters, Repeaters and Extenders’ meeting the following conditions:

“The EUT, while having its own, unique FCC ID, is authorized for use with a specific, Certified transmitter, as a part of a defined system. **It must recognize and retransmit only those signals that originate from the transmitter with which it is authorized to operate (typically, this means that the EUT must be able to demodulate the incoming signal).**

The output must always comply with all of the parameters required by the specific Section under which it is authorized, regardless of the level of the input signal. It must be tested with each transmitter with which it is authorized to operate.

The Grant of Authorization for the EUT must list the FCC ID of the transmitter with which it is authorized to operate. The EUT may be tested with multiple transmitters, in which case the FCC ID of each must be listed on the Grant. The EUT may be authorized to operate with additional transmitters through a Class II permissive change, provided that test data is provided for each new transmitter. The Grant will then be reissued to reflect the additional transmitters’ FCC ID’s.”

If this 'Kit' is to be used and offered separately from a system, then it must meet the requirements of a 'booster, repeater or extender'. This means that it must be capable of decoding the input. I could not see where this was capable of this action. Thus, unless initially offered for sale as part of the original system, this Kit is not certifiable.

Please justify why this device should not be dismissed as uncertifiable. Such justification must address the discrepancies in the report description and other descriptions provided. Such justification must also address the fact that this device cannot be sold separately unless it meets the requirements the FCC has placed on boosters, repeaters and extenders for Part 15 devices. If this device is to be sold as part of a total system, please provide documentation that clearly and unambiguously shows this to be the case. All documentation must agree on this. Also, FCC ID label requirements must be appropriate for System use (i.e. they must meet 15.27, 2.925, 2.1033)

Sincerely



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.