

August 2, 2005

RE: FCC ID: PD9FJ3B2915ABG_ATCB002642

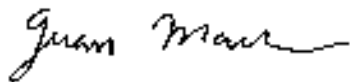
1. Please note that the original grant for this device in the 2.4Ghz range is 257mW. The highest value recorded in the test report for this PC is only 146mW. Please note that this is a difference of about 2.5dB. Please note that a PC2 must report no larger variation in conducted powers between the original and the PC2 than 0.5dB. The reported variation is too large for a PC2. Please provide data that is within the acceptable variations allowed by the FCC or please submit an application for a new FCC ID. IF power measurements showing 257mW for the 2.4GHz

Response: For the permissive change testing we were trying to test at output powers equal to those in the original device certification tests performed by Aegis. They measured both peak and average power. If we try and match peak power they measured with a peak power measurement with our peak power meter we end up with a higher average power, especially in g and a modes.

Peak power measurements are very variable and depend on the peak power sensor being used. We tested at the same average power as the original report (peak power was about 2db lower than measured at Aegis). We measured peak power using an alternative method and got values very close to those at Aegis.

For this reason we proceed with testing by matching average power measurements and recording peak power using the peak power sensor AND the UNII alternative method (setting the analyzer for max hold with sample detector and integrating over the band). We know its very important that we match power because Permissive changes require us to test at the same power level as noted in the original test data, so that the reason we provided the two peak power measurements to help assist in justifying the use of average power to match power levels. The expla results are mention on pages 45- 47 and 30 – 34, and 55 – 58.

Regards,



Juan Martinez
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JM/dmg