American TCB

October 24, 2005

RE: 2Wire, Inc. FCC ID: PGR2W3700ATH
Attention: Tim Johnson

Please find our responses to your comments on this Application below:

1) Not all ports appear to be filled. Where the various ports investigated to ensure worse case was used for testing or that they didn't influence TX testing.

> Testing indicated that the emissions related to the transmitter and receiver were unaffected by the number of cables connected to the interface ports. During testing one of each port type was connected to a cable and a remote peripheral

2) 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. Please explain how this device is compliant to this requirement for both DTS and UNII bands of operation.

> Products shipped within the US are only capable of operating on channels 1 - 11 as detailed in the Form 731. They cannot operate on any other channels. Do you need a formal statement from the manufacturer explaining this ?

3) Power spectral density does not appear to utilize a VBW > RBW as specified by FCC procedures for 802.11b or g. Please review.

> The PSD was measured with RB=VB=3kHz and not wirh RB=3kHz, VB > 3kHz. Increasing the VB from 3kHz to 10kHz would not result in an increase in the measured level of more than 5dB (10log[3/10]), therefore the device would still comply with the 8dBm/3kHz limit given that the hihest measured PSD with RB=VB=3kHz was -2.6dBm/3kHz. Please advise if this measurement needs to be retaken.

4) FYI….The manual does not appear to contain the necessary information on a single page as required by 2.1077 for DoC applications. Please ensure the manufacturer updates this.

> Noted, we will pass this on to 2-Wire.

Regards,

Mark Briggs
Principal Engineer