



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

August 8, 2004

RE: FCC ID: PQRDS540-APDL_ATCB001570
Attention: Hiroka Umeyama / Yukari Ito

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that DSS is the equipment code for Frequency Hopping Spread Spectrum devices under part 15. DTS is the more appropriate equipment code for WLAN devices in the 2.4 GHz range.
2. FYI – please note that there may be some advantages of declaring the 5275 to 5805 band under 15.247 instead of the 15.407 UNII rule. You may want to investigate this approach.
3. Please explain how the removable antenna connections shown in the internal photos are to be considered integral (permanent) for the purposes of meeting 15.407(d). (i.e., how is the box made to prevent the user from obtaining access to the inside of the device [special tools required to open the unit]? Or is the antenna epoxied to the connector when installed?)
4. Please explain how the device operating in the UNII bands meets the requirements of 15.407(c).
5. Please note that page 5 of the operational description states that power at the lower and higher frequencies of 2412 and 2462MHz must be reduced to 11dBm and 10dBm respectively in order to comply with FCC rules. However, testing was done at 19+dBm in 802.11g mode and 15+dBm in 802.11b mode with the results showing compliance. Please explain the statements in the operational description in relation to the test results.

Dennis Ward
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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.