



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

December 15, 2005

RE: Netgear Inc.

FCC ID: PY30500014

After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) As given in my email of 11/10/05 and per the FCC interpretation, the users manual should clearly document configuration conditions allowed and for use with specific radio cards to ensure compliance with applicable part 15, licensed-service, and RF exposure (mobile condition) rules. Information regarding specific use and limitations of the PCMCIA portion are not currently given in the manual. Please update.
- 2) Users manual mentions no co-location on page 4 several times. Please note that this is not true for this device. The manual should be modified to clearly identify co-located configurations that are allowable and specific any other co-located configurations are not allowed. Please adjust the users manual as necessary.
- 3) RF exposure for PCMCIA Card used ERP in calculations, while this should be EIRP (308 mW ERP – 505 mW EIRP). Additionally, please note that reference to SAR is not applicable and should be removed.
- 4) RF exposure exhibit should properly add ratio of power density/limit together and be < 1 to show compliance. For instance:
$$0.0090/1.0 + 0.1/0.474 = 0.22 \text{ which is } < 1$$
Please adjust.

Previous Comments Still to Address:

- 5) The power output of this device appears to only be 14.72 dBm (29.7 mW) according to the test report. However the new operational description mentions up to 20 dBm (100 mW). The FCC expects the device to be tested at maximum output during EMC testing. Please confirm that the device was tested at maximum output power it will be manufactured at. If not, retesting may be necessary. Please review and either provide new data or a corrected operational description as necessary.
- 6) It is assumed that this device is intended to only be used with a certain PCMCIA Cards as intended by the manufacturer. Please explain what precautions are built into the device so that the device will only function with the particular PCMCIA card(s) specified within this application.
- 7) 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. For instance, the user should not be able to select alternative countries which would allow different channel plans outside of the allowed USA band. Please provide an explanation of how this device is compliant to this requirement.
- 8) FYI...It is uncertain which power method was applied for 802.11g. Since this may affect limits applied for non-restricted bands, specific methods should be identified per the FCC guidance document for DTS devices. Please consider this in the future.

- 9) FYI....In the future, please try to center the keyboard on the monitor per ANSI C63.4. If necessary for the mouse, please extend the surface, or consider placing the mouse to the other side of the keyboard.
- 10) FYI....This device is also subject to a DoC, but the manual should be updated to place the following specific information on a single page in the manual.

COMPLIANCE INFORMATION (47CFR 2.1077)

If a product is tested and authorized under a Declaration of Conformity, a compliance information statement shall be supplied with the product at the time of marketing or importation, containing the following information on a single page:

- (1) Identification of the product, i.e. name and model number.
- (2) A statement similar to that contained in Section 15.19(a)(3) that the product complies with Part 15 of the regulations.
- (3) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.



Timothy R. Johnson
Examining Engineer

[mailto: tjohnson@AmericanTCB.com](mailto:tjohnson@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.