



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

April 12, 2007

RE: Radwin Ltd.

FCC ID: Q3KAMWL1240

After a review of the submitted information, I have a few comments on the above referenced Application. Depending on your responses, kindly understand there may be additional comments.

- 1) The internal photographs may not normally be held confidential strictly on the basis of trade secrets. This typically requires a stronger justification as to why the end user would never be able to see the internal components (i.e. device is potted, etc.). It should be explained how the user would never expect to be able to simply open the device. Please remove this justification from the letter of confidentiality or provide a better justification. As an alternative, you may use a black marker to "black out" the top of any readable components and provide new internal RF photographs. Please let us know how you wish to proceed with this issue.
- 2) **Block Diagram** appears to show the device is capable of both 5 GHz and 2.4 GHz. However the application does not support this. How is this device in compliance with 15.15 for 5 GHz.
- 3) **Operational description** appears to show the device is capable of 4.9, 5 GHz and 2.4 GHz. However the application does not support this. How is this device in compliance with 15.15 for 4.9 & 5 GHz.
- 4) **Users Manual** appears to show the device is capable of 4.9, 5 GHz and 2.4 GHz. Given the internal RF card appears to operate be capable of operation on these frequencies, how is this device in compliance with 15.15 for 4.9 and 5 GHz.
- 5) Operational Description for integrated antenna shows both 17 and 15.2 dBi gain antenna – however this application does not appear to support a 17 dBi antenna. Please review.
- 6) This device appears to incorporate a standard N antenna connection. To meet the requirements of 15.203 using a standard connector, this device must be limited to Professional Installation only. This requires a cover letter requesting and justifying how the applicant ensures professional installation to be provided. The letter should address the following 3 items:
  - a) Marketing  
example: The device cannot be sold retail, to the general public or by mail order. It must be sold to dealers or have strict marketing control.
  - b) Requires professional installation;  
  
examples:
    - installation must be controlled.
    - installed by licensed professionals ( EUT sold to dealer who hire installers)
    - installation requires special training ( special programming, access to keypad, field strength measurements made) What is unique, sophisticated, complex, or specialized about your equipment which REQUIRES it to be installed by a professional installer?
  - c) Application  
example:
    - The intended use is generally not for the general public. It is generally for industry/commercial use.

- 7) Test photographs for AC powerline conducted photographs appear to show the device unterminated. Note that either the antenna or appropriate termination should have been utilized. Please review.
- 8) Page 113 of the users manual suggest the user can use any antenna they desire with the device. This is not the case (see FCC Part 15.203/15.204) and only certain approved antennas can be used. Please review.
- 9) Please explain compliance to 15.15 for the 24 dBi gain antenna. I.E. What keeps the end user from being able to adjust the output power above 250 mW through the user interface if the 24 dBi gain antenna is installed with the unit?
- 10) Plots do not fully support the method specified by 7.2 (i.e. RBW > 6 dB). Please review DTS test guidance as well.
- 11) Should plot 7.4.11 include an additional note as well?
- 12) Peak to average plots appear odd. Average measurements appear flat and do not appear to show any emissions. Normally this implies that a duty cycle was present and therefore a VBW > 10 Hz may be necessary. (i.e. plots on pages 111 – 116). Additionally, it is uncertain why emissions on these pages for peak are as high as they are given earlier pages (pages 85 – 110 do not appear to show any significant readings. Please review/explain/etc. See difference between 15.2 and 24 dBi results and comparison between peak and average.
- 13) Please explain the high readings noted on plots 7.5.7 – 7.5.9.
- 14) It is uncertain why emissions on these pages for peak are as high as they are given earlier pages (pages 128 - 154 do not appear to show any significant readings while the results on pages 155 – 160 do. Please review/explain/etc.



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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.