



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

July 10, 2005

RE: RadWin Ltd.

FCC ID: Q3KAMWL1530

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

- 1) An updated 731 in response to previous comment 1 has not been received.
- 2) Photographs addressing previous comment 6 do not appear to have been received. Please provide.
- 3) Photographs of the back of the host motherboard have not been provided. Please provide.
- 4) Information in last response mentions a filter on the RF BPF output near the antennas. It is not understood where this may be found. The mini-PCI card is a dual band card and allows operation in both bands by itself and schematics do not show a filter. The main host motherboard does not appear to show any additional hardware around the antenna connections and appears to simply be a pass through port. Please explain.
- 5) Please note that the FCC no longer desires that the safe distance for mobile devices be calculated in the RF exposure exhibit if the safe distance is < 20 cm, but instead prefers the power density results to be calculated at 20 cm and compared to the power density limit as a mobile device. Please correct.
- 6) If the device was terminated at the antenna port for unintentional radiated tests per your response, then test data to 15.111 must also be provided.
- 7) For IC (on RSS-210 section 6.2.2 (q1)(iv)(g)), the users manual should caution the user to take note that high power radars are allocated as primary users (meaning they have priority) of 5250-5350 MHz and 5650-5850 MHz and these radars could cause interference and/or damage to LELAN devices.
- 8) We are required to upload a simplified operational description (1 – few pages) to the FCC as part of the application process. Please provide a separate operational description exhibit.
- 9) Regarding previous question 21, average measurements to 15.205/15.209 using a 10 Hz VBW assume a continuous carrier. In the case of any pulsed carrier, average measurements may be obtained instead by correcting the peak measurement by the average duty factor. However for these types of devices they typically transmit for > 100 msec and therefore typically can not be applied. In order to make average measurements acceptable to the FCC, the VBW must be > 1/T or valid worse case results for duty factor that can be applied via FCC rules must be shown. This will affect results in section 5.1.4. Note that if a duty factor less than 100 msec is always present based on the design of this equipment, you may measure with VBW > 1/T and still additionally apply the correction factor. Please correct as necessary.
- 10) Item 9 will likely affect the bandedge emissions and likely the high channel will need to be moved to 5320.
- 11) Page 79 of the users manual still contains information regarding the user using any antenna they wish. This is not true. First the system must be professionally installed and second, only antennas approved for use with the system may be used. The purpose of 15.203 of the rules is so the user can NOT simply change the antenna to another. Professional installers are responsible to ensure only the correct antennas are being installed. This section of the users manual should explain that only antenna approved for use with the device can be used. Please correct the users manual as necessary.
- 12) Previous question 12 stated:

This device has different output power for internal vs. external power. Please explain compliance to 15.15 for power level settings. The end user should not be capable of adjusting this. Are the units shipped from the factory with set maximum setting depending on internal or external versions. Please explain.

Your response stated:

This device has different output power for internal vs. external power. Please explain compliance to 15.15 for power level settings. The end user should not be capable of adjusting this. Are the units shipped from the factory with set maximum setting depending on internal or external versions. Please explain.

However the users manual shows a 22 dBi external antenna as well (page 22). The 22 dBi external antenna appears to contradict information previously provided and that provided in the report. Please explain compliance to 15.15 for power level settings. It is not understood how this will be compliant given different external antennas that can be used.

- 13) New spectral density requirements support only the 22 dBi gain antenna. Please provide information to show compliance for the 28 dBi gain antenna.



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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.