



# Washington Laboratories, Ltd.

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October 22, 2002

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

RE: Comments of October 14, 2002  
APPLICATION: FCC ID: QGK-DT100 Demarc Technologies Group, LLC

Dear Mr. Ward:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in ***bold italic***. Many responses refer you to additional exhibit(s) which has been uploaded to the application folder at the ATCB website.

Thank you for your attention. Please feel free to contact us for any additional information that you may require.

Regards,

*Gregory M. Snyder*  
Chief EMC Engineer, Wireless/Telco Services Manager

*Brian J. Dettling*  
Documentation Specialist

WLL Project: 7165

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October 14, 2002

1) Please note, I can find no reference to a grantee code of QGK on the FCC server. Also please note that there is no listing showing that Demarc Technologies Group, LLC has a grantee code. Please correct all documentation to provide the correct grantee code, or alternately please obtain a grantee code for Demarc Technologies Group, LLC and provide corrected documentation showing a valid grantee code.

***R. The Grantee Code, which was previously dismissed due to a processing error, has been restored and is valid as provided.***

2) Please note that a 'release' letter is insufficient for access to schematics and other information held confidential by the FCC. Also, please note that the ID reference provided does not seem to exist. Please provide the information in the form of an exhibit to ATCB. The following files will need to be uploaded to the ATCB server in order to proceed: Confidential Schematics, confidential Block Diagrams.

***R. A letter referencing the original release letter has been prepared to revise errors and clarify the required exhibits. Please see exhibit "ZComax Release Letter Amendment.pdf".***

3) Please note the 731 form states that this device operates in the 2400 MHZ ISM band. However, your MPE states compliance to 15.407 (UNII) band. Please correct the appropriate documentation to reflect the correct operating frequency range and MPE conditions.

***R. A revised MPE report has been prepared, however, no reference to a U-NII device was noted. Please see exhibit "DEM7165 MPE Rev 1.pdf".***

4) Please note, certain documents claim that this device is professionally installed. However, this is a PCMCIA card usable in any PCMCIA slot. Professional installation indicates that a one-time installation process is involved. Please note that a PCMCIA format card is intended for repetitive or at least multiple installation and reinstallation. What is to prevent the user from keeping the PCMCIA card and using a standard antenna connected to this device in other locations, applications, etc.? Please explain how it is possible for a PCMCIA card to be limited to professional installations. Alternately, please correct all appropriate documentation to remove any indication of professional installation and provide the unit with a unique connector.

***R. The device is being supplied with a unique connector and will not be professionally installed. The test report, MPE report, and manual have been updated to reflect this.***

5) The manual does not contain the appropriate statement in accordance with 15.21 (Information to user). The 'no unauthorized modification' statement must be provided in the manual. Please correct the manual to include this statement.

***R. The statement has been added to the revised manual. Please see exhibit "100MW User Guide Rev 1.pdf".***

6) Please note, ANSI C63.4 is not the proper test method for Spread Spectrum devices. DSSS devices should be tested in accordance with FCC97114 or equivalent. Please provide indicate testing was performed using this or similar FCC accepted test methods for SS devices.

***R. The revised test report now lists the FCC97114 guidance in the referenced documents. Please see exhibit "DEM7165X Test Report Rev 1.pdf".***

7) Your report states the use of an Omni-Directional antenna of 17.8dBi. However, the manual says this is a 45d degree Sector Panel antenna. Please correct the reference to the type antenna used to be consistent.

***R. The revised test report has been updated to properly list the antenna used for this device.***