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July 25, 2003

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

RE: Comments of July 1, 2003
APPLICATION: FCC ID: QGK-DT200 Demarc Technologies

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: 7384

July 1, 2003
RE: Demarc Technologies
FCC ID: FCC ID: QGK-DT200

1) Please note that the Zcomax FCC ID requested to be used in the application is not the same FCC ID as that stated as being the same in a previous application. Please verify that the transmitter schematics for M4Y-325H2 to be used with this application is the same as M4Y-325H1 which was used in the precedent application you specified as the same in that application.

R. Please disregard the ZComax Release Letter. This application uses the ZComax FCC ID: M4Y-0325H and the appropriate supporting exhibits have been uploaded.

2) Please note that confidentiality was not checked on the 731. Also, no request for confidentiality letter was provided. If the block diagram, schematics and operational description for this device are confidential, you will have to provide a confidentiality request letter specifying these exhibits.

R. Please see exhibit “Revised DT200 Form 731.pdf” which confidentiality has been indicated, and exhibit “Req For Confidentiality.pdf” which indicates that the block diagram, schematics, and operational descriptions should be held confidential.

3) Please note that the schematics, block diagram, operational description and internal photos of the card are the same as for the QGK-DT100. However, the power of the previous device is 100Mw while the power for this device is 200 mw. If all of the listed items are the same, I would expect the power to be the same or similar. What components, alignment procedure or other aspects of the device cause this to be 200mw while an apparently identical device previously granted is 100mw? Please explain.

R. The QGK-DT200 uses the 200mW unit from ZComax (FCC ID: M4Y-0235H). Please see exhibits “ZCom Theory of operation A.pdf”, “ZCom Theory of Operation B.pdf”, “ZCom XI325H Schematic.pdf”, and “ZCom xi325h_block diagram.pdf”.

4) Please note that the rf exposure states 15.407. The device operates under 15.247. Please correct your MPE report to reflect this device.

R. The typographical error has been corrected. Please see exhibit “DT200 Revised MPE Report.pdf”.

5) Please note, certain documents claim that this device is professionally installed (MPE report). While this device may actually only be sold and installed in this type of configuration, it is after all 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 using this PCMCIA card a laptop or other non professionally installed applications, etc.? For example, is the PCMCIA card blocked via BIOS (can only certain configurations use this device and all other applications not use the device? – how is this possible?) Please explain how it is possible for this PCMCIA card to be limited to professional installations as indicated. Alternately, while it is may actually be sold and installed in the manner indicated, the grant for the device would not contain a note for professional installation, please correct the MPE report to remove any indication of professional installation.

R. The MPE report has been revised and the reference to professional installation has been removed.

6) The manual appears to have conflicting MPE distances listed. In the RF exposure statement (Page 1) it states installation of an antenna of 18dBi gain is not to be closer than 35cm yet the next statement (The following precautions must be taken during installation of this equipment) states 25cm separation must be maintained. Please correct the manual to be in line with the reported minimum separation distances. Please note also that my calculations show a 35cm separation would be for an antenna gain of 18.75dBi (numeric gain of 75) while an 18dBi antenna would give 32 cm separation.

R. The manual has been corrected to indicate the proper separation distance. We concur with the 32 cm as per your calculations. Please see exhibit “DT-200 Revised User Manual.pdf”.