



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

January 6, 2004

RE: WaveIP Ltd.

FCC ID: QQ2-GA24-RSU

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

- 1) We do recognize that Hermon Labs is A2LA accredited. However, there are special concerns regarding foreign labs in 2.948 (d)(1)(i)-(iii) that must be taken into consideration. We used to be able to verify acceptable foreign accredited lists on the FCC site. However, it appears that this list is not currently working. (see) I have emailed information to the FCC for clarification. I will keep you posted regarding this issue.
- 2) Although the ports may have been filled according to ANSI C63.4, this standard shows specific positioning requirements for desk top testing (device along back edge of table, 10 cm apart. Other devices along front edge and/or beside keyboard as shown, etc. Positioning according to this standard does not appear to have been followed. Part 15 TX's should follow ANSI C63.4 13.1.2 or provide an adequate justification as to the configuration used for TX testing being different than specified by ANSI C63.4. Note that regardless, the authorization for the PC peripheral portion (whether Certification or DoC) should follow setup guidelines for both positioning and maximizing the test configuration per ANSI C63.4 12.1.2. It does not appear that the measurements made for section 4.6 meet these requirements.
- 3) Please provide measured data to show the worse case duty cycle of 65%.

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Examining Engineer

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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.