



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

February 25, 2003

RE: Airespace

FCC ID: QTZVAP1200

I have a few comments on the above referenced Application.

General Information

- 1) Conducted emissions were performed only from 450 kHz to 30 MHz per 15.207 and are compared to the current FCC limits. It is recommended that the conducted emissions meet the future limits (CISPR) that will be required in the next few years (extends the frequency range and also changes the limits. This is because the grant will be issued with one of the following grant notes depending on which set of limits it is shown to have met:

Current Limits

NOTE: The manufacture and importation of this device must cease on July 10, 2005 pursuant to 15.37(j) or 18.123 transition provisions adopted under FCC 02-157 (ET Docket 98-80).

Future Limits (CISPR)

NOTE: This device has shown compliance with the conducted emissions limits in 15.107, 15.207, or 18.307 adopted under FCC 02-157 (ET Docket 98-80) and may be marketed after July 11, 2005 and is not affected by the 15.37(j) or 18.123 transition provisions

Please comment on this issue. Also please note that page 5 of 46 lists the test results that may require changing if the current results will be adjusted for the CISPR limits.

UNII Specific Information

- 2) Please provide the attestation from Airespace referenced in the reply.
- 3) The AC conducted paragraph listed on page 5 of 46 should be 15.207. Please correct.
- 4) The external antennas with the connectors already attached to the device are not suitable for the 5.15-5.25 GHz band (according to information in the application these will be added at a later date via a permissive change). Please explain.
- 5) Your response mentions that different models in the future may allow the user to upgrade the units. Please note that for the 5.15 to 5.25 GHz band, the antenna connections currently provided in the product are not acceptable for the FCC's intent of the integral antenna requirement if the user is expected to remove the "access door". Note that an antenna that attaches with a connector inside of the case is acceptable, provided that there is no need for the user to ever open the case. Therefore the users manual should not make any reference or explanation to the user on how to open the device. Additionally, the cover should be sealed such that the user has no easy way to open. For instance the use of special screws so that the user can not simply open the device with any standard household screwdriver set, or the door may be "glued" shut.
- 6) The test procedures issued by the FCC do describe the intent to obtain "average power" (see attached document). From our discussion Airespace has also made many measurements (both peak and average) to the transmitter to help explain some differences previously discussed. Please add a column for average measurements or adjust the power measurements for average measurements (note this may also affect the RF exposure calculations provided and any summary of results shown).
- 7) Please provide an updated users manual which includes the statements necessary for 15.407(e) as referenced in your last reply.
- 8) Your response regarding 15.407(g) mentions that the transmit frequency did not drift out of band. Please confirm that this includes all of the occupied bandwidth within 26 dB of the fundamental.

- 9) Please verify the data on page 27 of 46. It appears that 2 points may be out of specification or the incorrect limits applied. However this data also appears to be presented with correct limits on page 34 of 46. Please explain.
- 10) Note that spurious emissions NOT falling in restricted bands must also meet the requirement of 27dBm/MHz. This device appears to meet this although information in the report was not given. Note that 27 dBm/MHz may be calculated using the far field equations and equals a limit of  $-38.8 \text{ dBm} / 68.3 \text{ dBuV/m @ 3 meters}$ . Please comment.



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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.