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

April 5, 2005

RE: FCC ID: QVT-528_ATCB002121
Attention: Rick McMurray / Kathy Grzovic
Supplemental comments
I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please note that in your response to Mr Graff of ATCB, you mentioned that the three 802.11g cards are certified modules. Please note that while the modules may be certified, it is still the responsibility of the applicant to properly label this device. This means that in accordance to the modules manual, the FCC ID number of the module must be placed on the outside of this device. Please note that no such evidence exists in the filing that this has been properly done. Unless this label can be shown as evidence that these transmitters are under the modular approval, then the assumption is that all transmitters are under the one FCC ID. As this deals with the proper labeling of a certified device, please provide proof that this module use label will be placed on the device (i.e. a sample label stating "Contains FCC ID: QVT-WLAN-MP1).   Otherwise, please provide the necessary test data to support the use of all transmitters under the one ID.

2. Please note that in your response to Mr Graffs comments you mentioned that incorrect reference of a 24dBi antenna was done. However, no evidence has been provided that this erroneous reference has been corrected (i.e. test setup photos still show unapproved antennas on the 802.11g transmitter antenna ports). Please note that the modular approval for QVT-WLAN-MP1 does not only deal with the module, but with the antenna(s) approved with the module. As the test setup photos clearly show that non-approved antenna(s) were used, this then means that the grant conditions for that module have been violated and the device, as shown used, is not certified. This means that the 802.11g transmitters connected to unapproved antennae do not fall under the modular grant QVT-WLAN-MP1.   Consequently, these devices must either fall under the FCC ID: QVT-52B, or the test setup photos and test data must be in accordance with the grant conditions for the 802.11g modules. Please provide the corrected test setup photos that correctly utilize the 802.11g modules under FCC ID: QVT-WLAN-MP1.

3. Please note that the attestation from 3e Tech states that "Simultaneous transmission was investigated for intermod, spurs and increased levels. Data for this mode of operation is presented in the test report." Section 2.1 of the report states that the 802.11g transmitters were transmitting simultaneously with the 802.11b transmitter. However, as mentioned in item 2 above, no indication that the correct antenna(s) were used on the 802.11g modular transmitters has been provided. This means that these transmitters are not operating under the modular approval and thus are not considered certified. Please provide corrected data using a properly applied configuration for the modules in question. Alternately, please provide evidence that the device was tested correctly (i.e. in accordance with the modular approval of the QVT-WLAN-MP1); including corrected test setup photos.

Dennis Ward
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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.