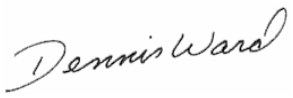
American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

August 14, 2005

RE: FCC ID: R8KUGWN2USHN33_ATCB002681
Attention: Mark Briggs

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 only the Schematics have been requested to be confidential. Please also note that cover letters (i.e. the confidentiality request letter itself) are not confidential material. Please note the that the operational description and block diagram have been uploaded as confidential but are not included in the confidentiality letter. If the operational description and the block diagram are desired to be held confidential, please so include in the request for confidentiality.
2. Please provide the required separate MPE report. Please make sure that the highest gain antenna used is included in the calculations.
3. FYI - Please note that the FCC generally wants to see a statement similar to **"Contains FCC ID: R8KUGWN2USHN33".** Please consider changing the phrase, **"Module FCC ID: R8KUGWN2USHN33" to** the suggested notice.
4. Please note that the PPSD plot for the 2479MHz channel shows the center frequency as 2478.850MHz. The peak signal of the frequency shift shown on the bandwidth plot appears to be 350kHz from the center frequency. This would put the peak at 2479.150MHz, which is off the plot shown on the PPSD. As the PPSD shown on the plots is about 7dBm, it is not possible to tell if the device is compliant as it appears that the Spectral Density at the peak of the transmission has not apparently been shown and is potentially 3 to 5dB higher than that measured. Please either use a span of sufficient width to include the side lobes of the transmission, or please center the plot so as to include the max peak of the signal (i.e. if you used a 1.5MHz span centered on the stated channel, this would show the PPSD of the entire signal).
5. Please note that the FCC has stated that the PPSD shall be measured at a time rate of span/3kHz. As the span shown in the plots is 500kHz, this would mean that a sweep time of 166 seconds should have been used and not a sweep time of 100 seconds as shown on the plots. Please note that as the sweep time used is almost half that required, the results may not comply with the required 8dBm. Please perform PPSD at the required time in relation to span as stated by the FCC.



Dennis Ward
mailto:dward@AmericanTCB.com

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.