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

May 2, 2005

RE: FCC ID: RFM-ACCESS-ONE-O2_ATCB002375
Attention: Leon Kogan

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 the FCC ID number on the 731 and the FCC ID number on the label are not the same. Please provide a 731 with the correct FCC ID number. Please note that this would include all characters including the "-".
2. Please note that the "Confidential_BOARD DESCRIPTION" says there are three transmitter boards in the system. However, other documentation and the internal photos only show 2 transmitter boards. Please be consistent in your documentation. Please provide a board description document that reflects this device and this application.
3. FYI - Please note that the MPE report and the installation manual mentions correction of power levels necessary to comply to FCC rules. The manual mentions a document called "Access/One Network User's Guide" that contains instructions on this power reduction. While this was not asked for in the previous similar application, as this is an installation criterion it is expected that the FCC may desire to have this information. It may be advantageous to provide the section of this document that instructs the installer on how to compute and adjust the power level.
4. Please note that on pages 47, 49 and 51 of part 1 of the report the tables state the emissions are from 18 to 34 GHz. However, several entries state 2430.8MHz. Are these typographical errors and is this frequency meant to be 24308MHz? If so, please not that this is very close to the restricted band at 24GHz and more data may be needed showing levels at the emissions mask edges of this frequency to obtain compliance data. Please explain.
5. When not using the prescribed method of calculating EIRP for 15.407 devices, please provide the method used to calculate the associated limits (i.e. limits of 68.3 and 48.3 conversions of -27dBm limit). This formula and sample calculation needs to be in the report otherwise the results are ambiguous.
6. Please note that while the peak reading on page 25 of part 3 of the report (page 142) may be compliant with the 74dB limit, it fails the average limit. Please provide average data that shows this signal meets the average limits.
7. Please note that on page 31 of part 3 of the report (page 148) several frequencies have 10 to 20MHz differences between the peak and average measurements. While 1 or 2 MHz is a reasonable deviation for peak and average measurements, 20MHz is a significant deviation and needs explanation. Please confirm if these are the same signals being averaged. If they are not the same signal, please show compliance to the average limits. (Please note that this occurs several places in the report. Please confirm all readings of this nature).
8. Please note that for the 5.2GHz range operation the report is not clear if the output power was reduced to that specified in the rules for this test. Please note that operation in the 5.2GHz range requires the conducted output power to be reduced from 24dBm by 1dB for every dB the antenna gain exceeds 6dBi. While testing at the full output power may be worse case, it is not what the requirements state. Thus for a 23dBi antenna in this range a device with a conducted power of 21.22dBm would have to be reduced to 7dBm. Please explain.

Dennis Ward

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.