

American TCB

September 26, 2007

RE: FCC ID: SHD-A8YWFS

Attention: Timothy Johnson

Please find our responses to your comments on this application below:

1) The current **FCC agent letter** is signed by Roy Harlin and also still contains a box which can be moved or adjusted. Please adjust this letter for these 2 issues as appropriate per our previous comments.

See updated FCC agent letter.

2) The Standard Confidentiality Letter still mentions in the next to last paragraph that test photos, external photos, internal photos, and users manual require short term confidentiality (which is being requested separately) – which was previously mentioned in comment 5 but was likely not clear which letter was referenced. Additionally, this letter is also signed by Roy Harlin and not Harns Hartmann as well. Kindly adjust this letter for two issues.

See updated Standard Confidentiality letter.

3) FYI.....Regarding short term confidentiality, you are responsible for the following:

a) Note that any documents held under the short-term confidentiality will automatically become public after 45 days. A manufacturer may extend this period up to an additional 45 days. This requires an additional cover letter requesting this extension must be submitted to ATCB a minimum of 7 days prior to the expiration of the original 45 day temporary grant of confidentiality.

b) If the manufacturer engages in public marketing activities or otherwise publicizes the device prior to the expiration of the short-term confidentiality period, the applicant must immediately notify ATCB so the exhibits can be made publicly available.

Noted. Comments passed on to the applicant.

4) Your response to previous comment 13 & 14 cites power was measured as peak. However peak data clearly cites the following Note 1 which equates to an average technique:

19	2462	20.3	107.2	0.0	Pass	20.3	0.107	19.9	97.7
17.5	2462	18.8	75.9	0.0	Pass	18.8	0.076	18.1	64.6
Note 1:	Output power measured using a spectrum analyzer (see plots below): RBW=1MHz, VB=3 MHz, sample detector, power averaging on (transmitted signal was continuous) and power integration over 50 MHz The output power limit is 30dBm								
Note 2:	Power setting - the software power setting used during testing, included for reference only.								

Previous comments provided cited:

Average power techniques were applied to 802.11b/g – therefore pages 44-45, 64-65, and 85-86 should use –30dBc.

and

Average power techniques were applied to 802.11b/g – therefore page 47, 52, and following data tables should use –30dBc (i.e. limit of 62.4 dBuV/m/ -65.5 dBuV/m).

The Note 1 in the table for the 802.11b was incorrect. The plots show that power integration was performed over a max held, peak detector trace. The note in the table has been corrected. The -20dBc references are correct.

The 802.11g power measurements were done using an average technique. Therefore, I have verified that all references for 802.11g measurements are for -30dBc.

5) It appears that 15.207 is still used and mislabeled as restricted band references in the front of the report (see pages 7-11).

Corrected.

6) Regarding the concern about the DFS question, please see Andy L. presentation, page 28 from February 2007.

Original comment cited for clarity:

35) For DFS applications, the FCC has asked that the application include how DFS software security is – February 2007 TCBC training.

See the revised Theory of operations. Note, the user has no ability to turn off any of the DFS functions since they are hardcoded into the Atheros chip.

Regards,

A handwritten signature in blue ink, appearing to read "Mark E Hill". The signature is fluid and cursive, with the first name "Mark" being the most prominent.

Mark E Hill
Staff Engineer