



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

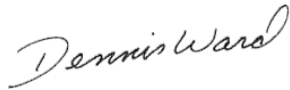
December 11, 2008

RE: FCC ID: SMFPC88903\_ATCB007079

Attention:

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 operational description does not appear to match what is going on in the device. The operational description states "The wireless LAN adapter communicates with USB Bus by the USB slot." However, from the internal photos it appears that the wireless lan transmitter connects to the PC via a Molex connector and not a USB. Please explain and please provide an operational description that fits the product being certified.
2. Please provide a photo of the bottom of the transmitter. Currently there appears to only be a photo of the top portion of the transmitter.
3. Please note that in order to use MPE calculations the transmitting structure (antenna) of the transmitter must be at least 20cm from the body during use. While it can be seen in the internal photos that the antennae appear to be in the upper LCD display, the size of the Laptop is not clear. For example, the photos seem to indicate that the device LCD is no bigger than 7.5 to 8 inches tall. Since the antenna are imbedded what appears to be a couple cm from the top of the LCD, it is very likely that the antennae may not meet the required 20cm separation distance. As such it cannot be easily determined if the laptop display meets the 20cm separation distance or not. Please provide dimensions clearly showing the location of the antennae and their separation distance to the human body. Please also note that the documentation states there are two antennae. Please clearly identify both antennae and where they are located in the Laptop.
4. Please note that the manual does not appear to have the required RF exposure statement. Please provide a corrected manual showing the required 20cm separation distance statement.
5. Please note that the manual does not appear to contain the non-modification statement required by 15.21 of the FCC rules. Please provide a manual with this required statement.
6. Please note that the manual does not appear to have the user information statement as required by 15.105. Please provide a manual with this required statement.
7. Please note that the device appears to be more than sufficiently large to contain the 15.19(a)(3) required label statement. Please correct the label to show this required statement. If this statement is on another label attached to the device, please show where on the device this statement is located.
8. Please indicate in the label sample how the label meets the requirements that it be permanently affixed to the device as required by 2.925 of the FCC rules.
9. Please note that the conducted ac data and the plots do not agree. For example, on page 10 of the 15C report you show a plotted data point over the average limit, but you show an average value of 12dB under the limit. Please explain what the plot is showing (i.e. is it a plot of peak readings?).
10. Please note that the FCC requires test labs using a TCB to follow accepted test procedures. Please note that the test report does not state what accepted test procedure was used for part 15C testing. Please clearly identify the acceptable test procedure used to measure the 15.247 data.
11. Please note that on page 14 of the 15C test report you state that you measured band edge data using ANSI C63.4. Please note that other than setup ANSI C63.4 is not an acceptable test procedure for 15.247 devices. Please provide a test report which properly uses acceptable test methods for 15.247 devices.
12. Please note that on page 19 of the 15C report the averaged signal on the second plot appears to clip the top reticule on the analyzer/receiver. Please explain what was done to insure that this was not a case of saturation of the receiving device. If the device was saturated, please re-measure.
13. Please provide the calibration due dates of equipment used during measurements.

A handwritten signature in cursive script that reads "Dennis Ward".

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. Except as described in §0.459, correspondence and responses 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.