



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

March 11, 2009

RE: Complex Systems PTE

FCC ID: TK4-WLM200N2-26

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Modular approvals typically require testing with a host. This host is not evident in the test setup photos. Please explain.
- 2.) I assume that Part 15B DofC will apply to this device? If so, then we need to have a DofC letter and revision to the label which includes FCC logo.
- 3.) It does not appear that any of your spectral power density plots follow FCC procedure. Please review and retake your data using a sweep time of 1 second for every 3KHz of bandwidth.
- 4.) FYI: For the future, please be sure to add RBW/VBW and sweep time settings to every radiated peak and average band edge plot.
- 5.) I get nervous whenever I see a report which states an "average detector" was used. The FCC only recognizes a 1MHz RBW/10Hz VBW setting for average measurements. Please double check and make certain that only the FCC accepted settings were used. Please refer to your plots above 1GHz in section 4.6 of your Report. Ideally, placing RBW/VBW and sweep time settings on each plot is the only way to not create questions.
- 6.) This mini-PCI card supports "multi-country roaming". Please indicate how this device will only transmit on legal frequencies in North America. If this device is also used in an access point, then "passive scanning" may also be implemented. Within a passive scanning access point configuration, how will channels be limited to 1-11 in North America?
- 7.) Page 5 in the Manual says that specific antennas are listed within the manual and should only be used with this device. Where is the antenna list?
- 8.) Page 6 of the Manual (top of page) has an important note which makes no English sense. What is the Applicant trying to say?
- 9.) FYI: Ad-hoc mode is restricted only for specific 802.11a products operating as clients within the 5GHz DFS bands. The Manual's prohibition from ad-hoc operations is irrelevant in the 2.4GHz band.

William H. Graff
President

[mailto: whgraff@AmericanTCB.com](mailto:whgraff@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 once 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.