

1.) There appears to be an RF connector on this device. This also is confirmed by the Internal Photos, and the Manual (item #3, page 73). Please be sure to address this issue. You are also reminded that all External Photos must show all ports and connectors to the device. Please supply an expanded set of photos showing all connections to this device. Are there provisions for connection of external antennas or coaxial cables to this product? Will the end user have access to this connector?

Reply: We have modified the file of "External Photo" and add a photo of this port. This port only connects to the coaxial cables for testing, and it doesn't connect to any antennas.

2.) There is an FCC logo on this device, implying that a DofC equipment authorization should apply to the Part 15B Unintentional Radiator portion of this product. The EMC Test Reports (see section 1.2) also confirm this assumption. You are reminded that only countries with valid MRAs with USA are able to use the Part 15B DofC procedure. Please review and address this issue.

Reply: The test is performed in Linkou Labs of Quietek.

3.) The Label is missing the 15.19(a)(3) statements. Assuming the FCC logo and DofC labeling statements are invalid, then there should easily be sufficient room for this language.

Reply: As this device is so small to show this statements, so we move it to the manual.

4.) The Operational Description contains a document titled "iWavePort WLU108AG-MC". This is not a proper operational description. What is requested is a description as to how this device creates, modulates, and amplifies RF energy. In addition, the supplied document describes a device with much different RF power than what was tested. Please see the "Transmission Levels" section on page 2.

Reply: We updated the Operational Description as attached.

5.) Is ad-hoc mode possible within the 5250-5350 MHz band? I cannot find this addressed anywhere within the Manual.

Reply: **The manual is under modification. Please check the top of page 4 on the manual.**

6.) The Test Reports do not provide any information about RF power over data rates. What is required is a chart of all data rates and conducted RF power. This is necessary to comply with "SAR Measurement Procedures for 802.11a/b/g Transmitters" published by FCC. The "worst case" or highest RF power/data rate combinations must also be used for all spurious emissions (including band edge) testing.

Reply: We have shown all data rates in the updated reports.

7.) The RF power measurements within the DTS report do not conform to FCC measurement procedures as described in KDB Publication No. 558074.

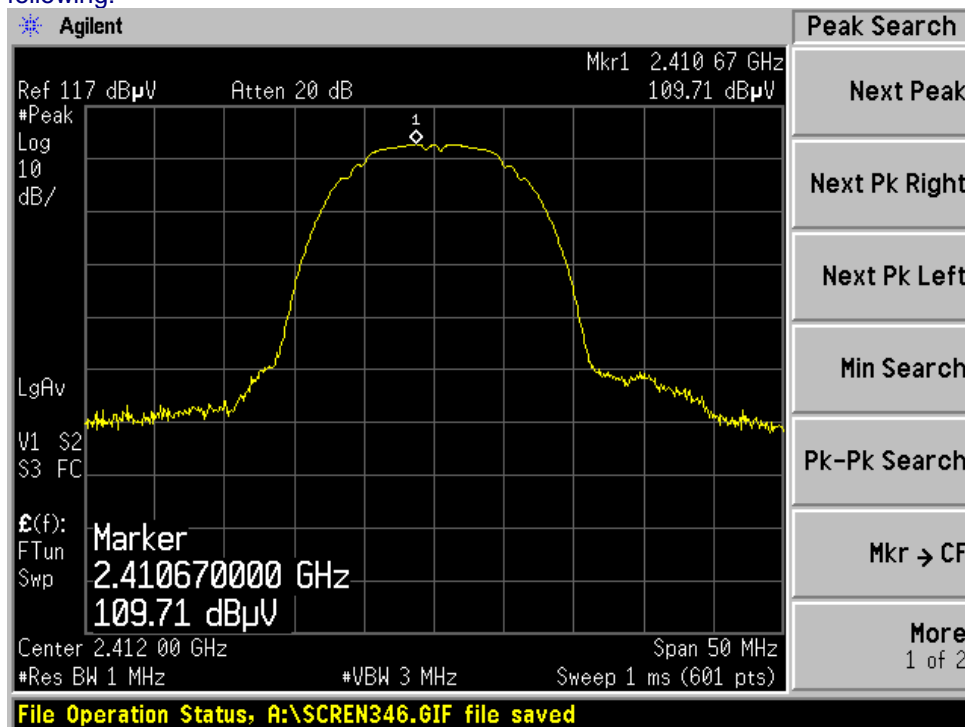
Reply: We retest the RF power according to the requirements of FCC Public notice, and updated the test report.

8.) The plots which begin on pages 191 and continue through page 230 of the DTS report have a multitude of problems. (1.) There is no vertical graticule displayed. It is impossible to estimate the frequency of any specific point in the trace, or the frequency associated with any marker. (2) The RBW/VBW settings and the associated sweep times are not available. There are references to average plots which use a 1MHz RBW/1MHz VBW. This is obviously incorrect.

All plots must be properly labeled and annotated. (3.) It appears that the device may not have been properly “peaked” in both antenna position and turntable rotation before performing band edge test. As an example, your 731 form claims a peak RF Pout of ~63mW. Assuming a 0dBi antenna, I would expect to see a displayed field strength of somewhere between 100-110dBuV. Your plots show peak plots with considerably less than expected field strength. (4.) The plot on page 218 is obviously distorted by excess sweep speed. In all band edge measurements using a 10Hz sweep. The key is to remember that slower speeds are better for proving compliance. (5) Some plots are not making the proper measurements. As an example, Page 2 January 15, 2008 when measuring the restricted band from 2483.5-2500 MHz, you must measure the highest frequency within the band, not simply the single band edge point at 2483.5MHz.

- Reply: (1) We added the detail mark point for this issue.  
 (2) This is a typical error, when we do Band Edge test, we use RBW=1MHz, VBW=3MHz, Sweep time=Auto for peak, and RBW=1MHz, VBW=10Hz, Sweep time =Auto for Average test.  
 (3) We recheck this Band Edge test, and found  
 (4) We test this Band Edge using RBW=1MHz, VBW=10Hz, Sweep time =Auto for Average test.  
 (5) We give the detail mark table in under test plots.

Otherwise, I want to discuss some question for this Band Edge test. For example of 802.11b, when we use the conducted test by the spectrum, the test result as following:



ERP per 1MHz = 109.71dBuV, then added the antenna gain of 0dBi,  
 EIRP per 1MHz = ERP per 1MHz + Gain = 109.71dBuV  
 As we know,  $P = (E \times d)^2 / (30 \times G)$ , so the  $E = 109.71 - 11.77 = 97.94$  dBuV/m  
 I think our test result refer to the field strength of fundamental of this band edge is correct, and after double checking this test, the test result has no change.

9.) I see no specific test results in the DTS report related to the 100KHz/20dBc antenna conducted requirements of FCC per 15.247(c) and described in KDB Publication No. 558074. Please provide these required measurements.

Reply: We added this test issues, and updated the test report.

10.) Several of the spurious emissions associated with the 5.8GHz DTS portion of the report were within less than 1dB to the limits. Please re-measure using the highest RF power/data rate combination found. Be sure to rotate across three orthogonal planes as required by ANSI C63.4.

Reply: We retest this test item, and found the X axis is the worse case. And Updated the test report.

11.) It does not appear that the UNII report follows FCC Public Notice DA 02-2138, August 30, 2002 for measurement of RF power. Until such time as FCC officially recognizes "channel power" measurements used by spectrum analyzer instrument manufacturers, the techniques described in DA 02-2138 must be followed. Deviations are allowed, such as those utilizing high performance RF power meters, but only upon submission to the FCC under the PBA procedure. Please be sure to incorporate all relevant test channels as described within "SAR Measurement Procedures for 802.11a/b/g Transmitters".

Reply: We retest the RF power by using spectrum, and updated the UNII test report.

12.) Please provide a more exacting description of how the UNII peak excursion power test was performed. Be sure to describe the data rates used for "worst case" results. Use DA 02-2138 as a guide.

Reply: We show a very detail description of the peak excursion procedure.

14.) Please indicate where in the Manual I can find cautions with regard to outdoor usage within the 5150-5250 MHz band, See 15.407(e).

**Reply: The manual is under modification. Please check the top of page 4 on the manual.**

15.) How is compliance assured with 15.407(c)?

**Reply: Please refer to following client's description and it also shows on page 4 of the manual.**

Note: This device has the same WLAN behavior with all other WLAN devices because we design this device to be compliant to 802.11 specifications. The fundamental access method of the IEEE802.11 MAC is CSMA/CA, that means when one station desiring to transmit sense the medium, if the medium is busy(i.e. some other station is transmitting) then the station will defer its transmission to a later time. If the medium is sensed free then the station is allowed to transmit. The receiving station will check the CRC of the received packet and send an acknowledgement packet(ACK). Receipt of the ACK will indicate that no collision occurred. If the sender does not receive the ACK then it will retransmit the fragment until it gets acknowledged or thrown away after a given number of retransmissions

When WLAN device is in idle status, it is listening (RX), and it won't send any packets.

In fault condition, or WLAN device is out of control, WLAN device self can not generate any packets, even beacon frames, so that WLAN device won't send out unexpected frames to air and break FCC rules.

16.) The DFS report indicates that only one nominal channel bandwidth is implemented. This is not correct according to both Form 731 and the UNII Test Report. Additional testing appears to be

warranted.

Reply: We've updated DFS report. Please check Page 6,15,16,18 and 19.

17.) The DFS report is also missing 30 minute non-occupancy data.

Reply: We've updated DFS report. Please check Page 17 and 18.

18.) See Rule 15.215. It is not clear if the 20dB requirement has been met with "Super A" emissions operating at either 5260 or 5240 MHz at the band edge of 5250 MHz, or at 5350 MHz when operating at 5320 MHz. Please provide additional clarification.

Reply: We disable the channel of 5240MHz and 5260MHz for Super 802.11a, and updated the test report.