

ETCB

May 20, 2009

Attention: Mark Briggs

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

- 1) DFS test photographs, please provide as a separate exhibit outside of the report (I can submit the report with photographs, they do not need to be extracted from the report, just need them as a separate file.

Response: See revised test configuration photograph exhibits.

- 2) No external photo provided ... are the internal photos also the external or does the device have a plastic case?

Response: The “external” photographs are included with the internal photographs. As the product is a module, it does not have an enclosure. Please use the same file for both the internal and external photograph exhibits.

- 3) I do not see a formal attestation regarding the following items (a and b below):
 - a. Non operation on channels 12 – 14 for the 2.4GHz band. I understand that there is a statement in the user guide/installer manual but the same manual also discusses world-modes. Please explain how the devices shipped in the US and Canada do not actively transmit on channels 12 -14.

Response: The manual makes it clear that the SMU software tool is provided to the module integrator and is to be removed from the host device prior to delivery to the end user. To address the condition of the device being set to the “Worldwide” regulatory domain, see attestation letter that explains how channels 12 – 14 do not employ active scanning and the device will only transmit in response to an Access Point operating on those channels.

- b. Please also confirm that the device does not support ad-hoc modes in the 5GHz DFS bands and on channels 12 – 14 in the 2.4GHz band.

Response: Summit attests that the device does not support ad-hoc operation in the DFS bands and on channels 12-14 in the 2.4GHz band. There is no mention of ad-hoc operation in the manual or operational description because it is not supported.

- 4) I noticed that the high channel in the 5.7 GHz band was measured differently than the other two channels. Please explain why (the note states that for the high channel the device was not transmitting continuously – did this not apply to all the channels?).

Response: Due to a bug in the software that was used to exercise the device, the high channel in the 5.7GHz band was not able to transmit continuously, at the time of the conducted measurements, so we had to use a different method for that channel (sample detector and max hold). All other channels were able to transmit continuously and could be measured with a sample detector and power averaging enabled.

Regards,



Mark Hill
Staff Engineer
Elliot Labs LLC.

Updated Exhibits:

- Test Configuration Photographs
- Attestation Letter – Passive scan channels 12-14