

Chris Harvey

From: daphne.liang [daphne.liang@tw.ccsemc.com]
Sent: Monday, July 07, 2008 10:38 PM
To: charvey-tcb@ccsemc.com
Cc: 'leah_peng'; 'Mike Kuo'; lucy.tsai; alex.chiu
Subject: Re: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971, Notice#2 --Urgent!Need to get certificate today!!
Attachments: SW902T_Report(RP1-1)970707.pdf

Dear Chris:

For this case, we have submitted you with the revised test report(970707). **And if no problem , our customer request to get the certificate today!!(NO later than 07/08/2008 Taipei time)** , please help and thank you so much!

BEST REGARDS

Daphne Liang ±çà±!p

----- Àà§e! daphne.liang/ccsemc ©ó 2008/07/08 10:33 AM -----

daphne.liang

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!-¥ó¶H!G charvey-tcb@ccsemc.com

°/Æ¥»§Ü°e!G "leah_peng" <leah.peng@tw.ccsemc.com>, "Mike Kuo" <mike.kuo@ccsemc.com>,

2008/07/07 04:20 lucy.tsai@ccsemc.com@ccsemc

PM

¥D!@!G Re: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971, Notice#2 --Updated

(970707)³su²

Dear Chris:

Due to Debby on the vacation until July 08, so I will take her job till she backs.
For your question, please see our re-measurement peak power on Page 25 of revised test report(970707).

Due to the urgent case,if possible with no problem , our customer needs to get the certificate as soon as possible
(NO later than 07/08/2008 Taipei time) !! Please help thank you so much!

BEST REGARDS

Daphne Liang ±çà±!p

"Chris Harvey"

7/8/2008

<charvey@ieee.org>

"jeter.wu" <jeter.wu@tw.ccsemc.com>, <charvey-tcb@ccsemc.com>

"leah_peng" <leah.peng@tw.ccsemc.com>, "Mike Kuo" <mike.kuo@ccsemc.com>

2008/07/02 09:12 PM

RE: FW: ?? RE: ?? RE: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971, Notice#2 --,ÉYó³q³¼

Jeter, your measurements show that there is almost a 7dB difference between the Peak Power and the Average Power. That is much bigger difference than is expected. The FCC Requires that the average power measurements for 802.11b/g devices be performed with 100% continuous transmission. The typical difference between Peak and Average power is 1-3 dB. Please explain why there is a 6.89dB difference between the Peak measurements and the Average measurements.

Best regards,

Chris Harvey

From: jeter.wu [mailto:jeter.wu@tw.ccsemc.com]

Sent: Wednesday, July 02, 2008 4:39 AM

To: charvey-tcb@ccsemc.com

Cc: leah_peng

Subject: Re:FW: ?? RE: ?? RE: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971, Notice#2 --,ÉYó³q³¼

Dear Charvey,

Sorry,I do not really underatand your meaning.

We use 100% duty factor during test peak & average power.

There is no 20% reduction for average test.

Peak and average value are actual test value.

Could you plaese explain how to do?

Thank you.

Sincerely yours

μ{¼-ì§P-Yx«n¹êÂç«Ç Tainan Lab

§d-Fì Jeter Wu

712 Yx«n;æ·sæ/ÆÁíÁG§|'½æE¼hÀæK,¹

No.8,Jiu Ceng Ling,Sinhua Township,Tainan Hsien, Taiwan

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daphne.liang

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jeter.wu/ccsemc@ccsemc, eric.yang/ccsemc@ccsemc, debby.dai/ccsemc@ccsemc,

leah.peng/ccsemc@ccsemc, tino.lee/ccsemc@ccsemc

°ÆY»§Û°e;G

alex.chiu/ccsemc@ccsemc

2008/07/02

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FW: ?? RE: ?? RE: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971,

7/8/2008

Hi all:

¥HαU-Ö©ö³q¹F®×¥óchris harveyα'³ºÝÃD,·D¹½D³B²z:

Debby, I have looked over the updated test report you have submitted. I am sorry it took me as long as it did. You indicate in the new report that the Peak Power is 19.1 dBm (81.3 mW), but the average power is 12.21 dBm (16.6 mW). This is a 6.89 dB averaging factor, which seems very unrealistic. The FCC typically requires 100% duty factor for 802.11 b/g devices, which would have no reduction from Peak to average measurements. It appears as though the duty factor was reduced to approximately 20% to make the average measurements.

The FCC's Measurement Guide for 802.11 devices states the following:

§Duty Factor and Peak to Average Power Ratio

Unless a device is not capable of sustaining continuous transmission or the output becomes non-linear, it should be tested with continuous periodic data frames to simulate close to 100% duty factor."

This policy can be found at: <http://fjallfoss.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=28238&switch=P>

Please let me know if you have any questions.

Best regards,

Chris Harvey

BEST REGARDS

Daphne Liang ±çà±|p

----- Àà§e¹ daphne.liang/ccsemc ©ó 2008/07/02 10:38 AM -----

"Lucy Tsai"

<lucy.tsai@ccsemc.com>

|-¥óαH;G "daphne.liang" <daphne.liang@tw.ccsemc.com>

°Æ¥»§Û°e;G

2008/07/02 04:06 AM

¥D;®;G FW: ?? RE: ?? RE: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971, Notice#2

FYI

From: Chris Harvey [mailto:charveyemc@gmail.com] **On Behalf Of** Chris Harvey

Sent: Tuesday, July 01, 2008 12:30 PM

To: 'debby.dai'

Cc: Chris Harvey; 'landy.sung'; Lucy Tsai

Subject: RE: ?? RE: ?? RE: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971, Notice#2

Debby, I have looked over the updated test report you have submitted. I am sorry it took me as long as it did. You indicate in the new report that the Peak Power is 19.1 dBm (81.3 mW), but the average power is 12.21 dBm (16.6 mW). This is a 6.89 dB averaging factor, which seems very unrealistic. The FCC typically requires 100% duty factor for 802.11 b/g devices, which would have no reduction from Peak to average measurements. It appears as though the duty factor was reduced to

7/8/2008

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This policy can be found at: <http://fjallfoss.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=28238&switch=P>

Please let me know if you have any questions.

Best regards,

Chris Harvey

From: debby.dai [mailto:debby.dai@tw.ccsemc.com]

Sent: Wednesday, June 25, 2008 2:27 AM

To: Chris Harvey

Cc: charvey-tcb@ccsemc.com; 'landy.sung'; lucy.tsai@ccsemc.com

Subject: ^H;G RE: ^H;G ^H;G RE: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971, Notice#2

Dear Chris,

Sorry for confusing you.

The "average power" was reduced below 13.98 dBm, please see attached revised test report on P.5 and P.27~P.28 for details.

The revised description of maximum peak output power is for item 3 you indicated on June,6 : "The test report states a test procedure for measuring maximum peak output power that will not correctly measure the power of these wideband signals. The description does not indicate if the channel power function of the analyzer is used, but the plots seem to show channel power. Please change the description to indicate if a channel power feature is used to measure power."

Best Regards,

Debby Dai À¹\$±!p

Compliance Certification Services, Inc / Tainan Lab.

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<charvey@ieee.org>

!-¥óµH;G ""debby.dai"" <debby.dai@tw.ccsemc.com>

°Æ¥»\$Û°e;G <charvey-tcb@ccsemc.com>, "landy.sung" <landy.sung@tw.ccsemc.com>, <lucy.tsai@ccsemc.com>

2008/06/25 02:22 AM

¥D!@;G RE: ^H;G ^H;G RE: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.:

7/8/2008

Debby, Thank you for the response. I have reviewed the new test report for the changes. Your e-mail indicated that the power was reduced below 13.98dBm, but the test report documents power at 19.10dBm. The measured power is still over the FCC's limit requiring SAR. Please explain.

Best regards,

Chris Harvey

From: debby.dai [mailto:debby.dai@tw.ccsemc.com]
Sent: Monday, June 23, 2008 10:15 PM
To: Chris Harvey
Cc: charvey-tcb@ccsemc.com; 'landy.sung'; lucy.tsai@ccsemc.com
Subject: ^H;G ^H;G RE: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971, Notice#2

Dear Chris,

The RF Power already reduced below 13.98 dBm, and we already retested all the tests.

We revised the description of maximum peak output power on P.19, please check test report.

Best Regards,

Debby Dai À¹§±!p
Compliance Certification Services, Inc / Tainan Lab.
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debby.dai

2008/06/17 01:36 PM
^H;G "Chris Harvey" <charvey@ieee.org>
°Æ¥»\$Û°e;G "Chris Harvey" <charvey@ieee.org>, charvey-tcb@ccsemc.com, "daphne.liang" <daphne.liang@tw.ccsemc.com>, "landy.sung" <landy.sung@tw.ccsemc.com>, lucy.tsai@ccsemc.com
¥D!@;G ^H;G RE: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971, Notice#2^{3µ²}

Dear Chris,

7/8/2008

Our customer try to reduce the RF power now, and we still wait the modified sample to retest.

Best Regards,

Debby Dai À¹§±|p
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"Chris Harvey"

<charvey@ieee.org>

2008/06/16 06:28 PM

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tcb@ccsemc.com>
°ÆŸ»§Û°e;G "landy.sung" <landy.sung@tw.ccsemc.com>, "daphne.liang" <daphne.liang@tw.ccsemc.com>,
<lucy.tsai@ccsemc.com>
ŸD;@;G RE: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971, Notice#2

Debby, I have not received any further communication from you. I am just checking in after 1 week. Please let me know if there is any further information for this application.

Best regards,

Chris Harvey

From: Chris Harvey [mailto:charvey@ieee.org]
Sent: Monday, June 09, 2008 6:28 AM
To: 'debby.dai'; charvey-tcb@ccsemc.com
Cc: 'landy.sung'; 'daphne.liang'; lucy.tsai@ccsemc.com
Subject: RE: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971, Notice#2

Debby, thank you for your response. I will wait for your further response to the other questions.

Best regards,

Chris Harvey

From: debby.dai [mailto:debby.dai@tw.ccsemc.com]

Sent: Monday, June 09, 2008 2:15 AM

To: charvey-tcb@ccsemc.com

Cc: landy.sung; daphne.liang; lucy.tsai@ccsemc.com

Subject: E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971, Notice#2

Dear Charvey,

I am Debby, the contact person of this project.

Please see the reply below in blue.

Best Regards,

Debby Dai 戴士平

Compliance Certification Services, Inc / Tainan Lab.

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----- Àà§eª sc.wang/ccsemc ©6 2008/06/06 06:16 PM -----

<charvey-tcb@ccsemc.com>

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2008/06/06 02:25 AM

°Æ¥»§Ü°e¡G <charvey-tcb@ccsemc.com>, <lucy.tsai@ccsemc.com>

¥D!@¡G E-Top Network Technology Inc., FCC ID: U6A-SW902T, Assessment NO.: AN08T7971, Notice#2

Dear SC Wang,

You are listed as the Technical Contact for the above referenced TCB application.

I have performed the application review and found the following item which must be addressed before the review can be completed:

1. (already sent to you on 6/4/2008 but copied here again to be complete) This device is an 802.11 USB Dongle device with an integral connector and antenna. The RF Power is 23dBm, which is above the level for which SAR is required for Portable devices. The Manual informs the User to maintain 20cm separation, but the device can be connected directly to the port on the computer (which is even showed in a figure in the manual). The FCC Mobile and Portable SAR procedures need to be followed:

<https://fjallfoss.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=20676&switch=P>

https://fjallfoss.fcc.gov/prod/oet/forms/blobs/IDRetrieve.cgi?attachment_id=25496

Please see items 1)c) and 2 and note 11 of the FCC policy for reference..

Debby: My customers still find a way to solve this issue.

They consider to do SAR or reduce the RF power.

I will reply to you their final decision tomorrow.

2. The online application form does not have the '-' in the FCC ID (U6A-SW902T) as documented in the application exhibits. Please confirm the FCC ID number, and if

7/8/2008

needed confirm that I have your permission to change the online form FCC ID.

The FCC ID is U6A-SW902T. Please help us to change the online form FCC ID.

3. The test report states a test procedure for measuring maximum peak output power that will not correctly measure the power of these wideband signals. The description does not indicate if the channel power function of the analyzer is used, but the plots seem to show channel power. Please change the description to indicate if a channel power feature is used to measure power.

I will discuss this issue to our engineer and reply to you later.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee. 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 e-mail address listed below the name of the sender.

Best regards,

Chris Harvey
Charvey-tcb@ccsemc.com

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