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August 12, 2009

To Whom it May Concern:

Summit Data Communications, Inc. is a manufacturer of Wireless Local Area Networking modules that conform to IEEE 802.11 and related standards. As part of our development process, Summit submits these modules for certification to various regulatory standards put forth by agencies such as CE, ETSI, FCC, IC and TELEC.

The Summit SDC-MCF10G is an 802.11g compliant miniature compact flash radio module. The specifications for this device may be found here:

<http://www.summitdatacom.com/SDC-MCF10G.htm>

This radio has undergone various regulatory testing and has received various certifications. The documentation for these activities may be found here:

[http://www.summitdatacom.com/SDC\\_MCF10G\\_Certifications.htm](http://www.summitdatacom.com/SDC_MCF10G_Certifications.htm)

Please note that all regulatory certification testing was conducted with a 0 dBi gain antenna with an omnidirectional coverage pattern. The data sheet for this reference antenna is embedded in this document and can be reviewed by clicking here:



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Word 97 - 2003 Docu

Currently, the SDC-MCF10G is being integrated into a device designed and manufactured by Portable Innovation Technology Limited (Pitech). We have received from Pitech data sheets which are to be integrated into the same device with the SDC-MCF10G. We have observed the following for both these antennas:

- 1) They both provide lesser gain than the reference antenna detailed above.
- 2) They both provide a radiation pattern that is quite similar to the reference antenna detailed above.

I would reference FCC Part 15 Section 204 rules which can be read here:

[http://edocket.access.gpo.gov/cfr\\_2008/octqtr/47cfr15.204.htm](http://edocket.access.gpo.gov/cfr_2008/octqtr/47cfr15.204.htm) and in particular direct your attention to section (c) and the following subsections 1-4 inclusive.

For your convenience, please allow me to quote from subsection 4:

“Any antenna that is of the same type and of equal or less directional gain as an antenna that is authorized with the intentional radiator may be marketed with, and used with, that intentional radiator. No retesting of this system configuration is required.”

Given our understanding of the above information, we believe that the relevant rules in Part 15 Section 204 subsection (c) apply in this particular case.

Please contact me if any additional information is required.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Ronald Seide". The signature is written in dark ink on a light background.

Ronald Seide  
President