



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

August 13, 2004

RE: FCC ID: AK8VGPWKB1_ATCB001591
Attention: Yoshiko Mizuta / Naoki Sakamoto

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. Please provide an operational description (theory of operation) that clearly describes the function of this transmitter. The device appears to be a FHSS device, however it is listed in some of the data as a DSSS. The operational description it is not made clear in the documentation. Please provide an accurate and detailed description of what this device is.
2. If this is an FHSS device, please provide a frequency Hopping table showing the pseudorandom hop sequence.
3. Please note the DSSS stands for Direct Sequence Spread Spectrum. Please note that your radiated emissions charts states "DSSS" modulation. Please note that you state this device has 78 'channels' (1 'channel' less than a Bluetooth) indicating that this may be a Frequency Hopping Spread Spectrum Device. Also, your technical specs state the device has 78 channels with 1MHz spacing, again indicating a device more in line with an FHSS Bluetooth type device. Please also note that the SAR report (which is not required for this device) states the testing was done with the WLAN and "Bluetooth" device operating simultaneously. While the CYWUSB6934 chip shown in the schematics is classified by Cypress as a DSSS chip, some of the terminologies and some of the other information indicate FHSS. What is this device? Please explain and please provide proof of its pseudorandom nature of the spread spectrum device.
4. If this device is a FHSS device, please provide the dwell time data and the channel separation plots.

Dennis Ward
<mailto:dward@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. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after 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.