



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

August 25, 2003

RE: Proxim Corporation

FCC ID: HZB-C38WCW

I have a few comments on this Application.

- 1.) FCC rules under Title 47CFR 15.407(d) and (e) clearly state that devices which operate in the 5.15 – 5.25 GHz band be limited to indoor use with integral antennas only. In general, this would prohibit the use of external antennas within this frequency band unless there are other measures taken to show these antennas are somehow “integral”. In addition, the use of “unique” connectors is not considered satisfactory to meet the integral antenna requirement.
- 2.) Please provide photographs of typical installations and conditions for all antennas
- 3.) The 9 parts of the Test Report total over 21 megabytes. This is far too large to be presented to the Commission. Please do your best to condense this into a more manageable form.
- 4.) The Manual gives no antenna installation instructions – especially critical when so many antennas are to be listed on the Grant. Please review.
- 5.) FYI: The 6dB bandwidth test is independent of which antenna is selected. This is usually performed as a conducted measurement.
- 6.) The Test Setup section for the Pout measurements does not show the detector in Section 4.4.4. Please review
- 7.) Your test data sheets in Section 4.4.6 for RF Pout are also confusing. If we are examining a Conducted measurement, what is the effect of the antennas?
- 8.) Power Spectral Density test in Section 4.5.7 and 5.9.8 is also a Conducted test. There should be no effect from the antennas.
- 9.) FYI: Please be sure to present Pout measurements across all bit rates for 802.11b/g.
- 10.) Manual must clearly identify this module as limited for use in Alpha-1 access points manufactured by Proxim. Use in any other system is prohibited.
- 11.) Manual must also include warnings prohibiting outdoor use in the 5.15 – 5.25GHz range.
- 12.) Several photographs show this device with “N” connectors on the antenna leads. It is assumed that in some instances, professional installation will be required. Please provide professional installation addendums to the manual for those instances.
- 13.) Please identify how use for 802.11b/g will be limited to channels 1-11 for the US market. Use on channels 12 and 13 is prohibited, and no provisions are allowed for software selection of channel skew. Please advise and provide an attestation from the Applicant that all product sold in the US will be strictly limited to these legal channels.

14.) MMCX connectors listed in the Test Report do not qualify as "Integral" in the 5.15 – 5.25 GHz band. Please review your Test Report

15.) It is not clear that Test Setup Photographs show all possible antennas for both Radiated and AC Conducted testing. Please review. Please identify each antenna by type on the photographs.

Regards,

A handwritten signature in black ink, appearing to read 'William H. Graff', with a stylized flourish at the end.

William H. Graff
President and Examining Engineer

[mailto: whgraff@AmericanTCB.com](mailto:whgraff@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.