



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

March 14, 2006

RE: ZyXEL Communications Corporation

FCC ID: I88G220V2

After a review of the submitted information for FCC, I have a few comments on the above referenced Application.

FCC Review

- 1) Section 15.15(b) prohibits adjustments of any control by the user that will cause operation of a device in violation of the regulations. Accordingly, any proposal to allow the end user to choose extended channels on frequencies outside of an allowable frequency band in the USA is not acceptable. For example, a WLAN device operating according to Section 15.247 on channels 1-11 between 2.4 - 2.483.5 GHz must not have any user controls or software to allow the device to operate on channels 12 and 13 which are outside of the allowed USA band. For instance, the user should not be able to select alternative countries which would allow different channel plans outside of the allowed USA band. Please explain how this device is compliant to this requirement.
- 2) Page 66 of the users manual mentions a maximum output power of 19.1 dBm +/- 3 dB for 802.11 b, 22.94 dBm +/- 3 dbm for 802.11g. Please note that the FCC expects worse case power to be measured during testing. Please note that +3 dB above power measured seems excessive. If worse case power was not used then this will require retetsting. Please review.
- 3) 802.11g power spectral density tests does not appear to match data provided in plots. Please review.
- 4) Please explain if all SAR data was taken in a 24 hour period. 2 test dates appear, but the FCC typically requires the validation and tissues parameters to be measured each day.
- 5) For SAR it appears that the probe angle between the probe axis and surface normal line > 30 degrees. If > 30 degrees, this must be covered appropriately in the measurement uncertainty. Please explain.

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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.