

American TCB

4/15/2005

In response to your comments regarding the applications for FCC ID PGR2WATHG01 please find our responses below:

1) Page 25 of the test report appears incomplete. Please review.
The report has been corrected.

2) Please provide details of the differences between the 4 models listed on page 25 of the report. The radio covers over ½ the board on a single board solution and changes to the layout could affect the results of this application. Please provide further details as necessary.

There is no layout difference in the wireless portion of the device between the models. The only difference is what Ethernet/DSL options are stuffed. Below is a matrix of model differences.

	DSL	Ethernet	WAN	Uplink	Wireless	USB
RG1801HG-00	Yes	Yes	No	Yes	Yes	Yes
RG1701HG-00	Yes	Yes	No	Yes	Yes	Yes
RG171HG-00	No	Yes	Yes	Yes	Yes	Yes

3) Please explain the large signal seen on the left hand side of the plots for pages 37 and 38.

All of the out of band conducted plots showed a large signal on the left edge of the plots. We have redone these plots. We do not know why the original plots showed this large signal. It is definitely not from the EUT. We will be checking the instrument that was used for the original measurement to see if it was an instrumentation issue.

4) Please confirm the output power for Low and High channels for 802.11b is correct. The power appears significantly lower and also data appears to be whole numbers while other data is given to a tenth of a dB.

The output power was correctly reported. It is lower on the low and high channels than at the mid channel because of the band edge requirements. The fact that the value does not have tenths of a dB is due to the way some Microsoft applications display numbers. If the value is an exact whole number, it drops the tenths digit and shows only the whole number.

5) Antenna gain in MPE is shown to be 6 dBi, while report page 40 states 2 dBi. Which is correct? Please correct for this inconsistency, making sure to adjust calculations for EIRP on page 40 or the MPE, whichever is applicable.

The antenna gain is 2 dBi as stated in the test data. The MPE data has been recalculated using the 2dBi value.

6) 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.

This is accomplished via the unit firmware. 2Wire has support for regulatory domains that are not customer settable.

7) For IC, it does not appear that RX emissions according to RSS-210 Section 7 do not appear in the test report.

Receiver emissions data has been uploaded

8) For IC, it appears that the letter associated with the CN number is missing from the Label and the RSP-100 form.

It should be 3439B. We've corrected the label and RSP-100 form.

9) For IC, we must submit the IC-03 Declarations with the Radio Approval. It does not appear that the DC-01 required declarations/forms were provided.

Uploaded DDC-01e-appenedix

Regards,

A handwritten signature in black ink, appearing to read "David W. Bare". The signature is fluid and cursive, with the first name "David" and last name "Bare" clearly distinguishable.

David Bare
Chief Technical Officer