



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

August 7, 2004

RE: Netgear Inc.

FCC ID: PY3MR814V3

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

- 1) Please provide a higher resolution label exhibit. The FCC ID must be easily readable.
- 2) Please confirm that a DoC has been performed for this device using an accredited test lab and the minimum test configuration per ANSI C63.4.
- 3) Please clarify if you are asking for:
 - a) Certification of the device as a TX, and a DoC has been performed by an appropriately accredited test lab for a PC peripheral
 - b) Certification as a TX + PC peripheral.

Note 1: The option b) would be considered as a composite application and 2 certificates (one for the TX, one for the PC peripheral portion) would be issued. There are additional review costs associated with this additional certification.

Note 2: to qualify to perform DoC applications, the test lab must be accredited (i.e. NVLAP or A2LA) to perform testing under the DoC procedure. ECC does not appear as an accredited test lab on the FCC site. Please explain.

Note 3: Note that for DoC tests, the device is configured with a minimum test configuration as specified by ANSI C63.4 which includes complete computer + 2 I/O devices attached (one may be the EUT).

Note 4: For the remaining part of this review, it is assumed that the device is being approved under a DoC for the PC peripheral portion.

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- 4) If the device is also been approved using a DoC, then the users manual must include the following on a single page:

COMPLIANCE INFORMATION FOR DoC AUTHORIZATIONS (47CFR 2.1077)

If a product is tested and authorized under a Declaration of Conformity, a compliance information statement shall be supplied with the product at the time of marketing or importation, containing the following information on a single page:

- (1) Identification of the product, i.e. name and model number.
 - (2) A statement similar to that contained in Section 15.19(a)(3) that the product complies with Part 15 of the regulations.
 - (3) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.
- 5) The test report mentions that radiated emissions were taken at 10 meters (page 16). However this is only allowed for < 1 GHz testing. Please explain what test distance was used for > 1 GHz.
- 6) It appears that only one channel was tested for radiated emissions. The FCC expects a Low, Middle, and High channel to be tested.
- 7) Data for > 1 GHz on pages 33 meet the 74 dBuV/m limit. However, there is also an average limit of 54 dBuV/m (RBW = 1 MHz, VBW >= 10 Hz, assuming 100% continuous TX) that must be met. Compliance to both limits must be shown.
- 8) The data shown on pages 45 appears to actually be average data from the plots and not peak data. The tables should be corrected.



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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.