



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

July 1, 2003

RE: FCC ID: QGK-DT200

Attention: Gregory M. Snyder / Brian J. Dettling

I have a few comments on this Application.

1. FYI – not action needed. Please note that Direct Sequence and other non Frequency Hopping Spread Spectrum transmitters under 15.247 use an equipment code of DTS not DSS.
2. FYI – no action needed. Please note that DTS WLAN devices are generally 2412 to 2462 MHz as these are the upper and lower channels for the US.
3. Please note that the Zcomax FCC ID requested to be used in the application is not the same FCC ID as that stated as being the same in a previous application. Please verify that the transmitter schematics for M4Y-325H2 to be used with this application is the same as M4Y-325H1 which was used in the precedent application you specified as the same in that application.
4. Please note that confidentiality was not checked on the 731. Also, no request for confidentiality letter was provided. If the block diagram, schematics and operational description for this device are confidential, you will have to provide a confidentiality request letter specifying these exhibits. .
5. Please note that the schematics, block diagram, operational description and internal photos of the card are the same as for the QGK-DT100. However, the power of the previous device is 100Mw while the power for this device is 200 mw. If all of the listed items are the same, I would expect the power to be the same or similar. What components, alignment procedure or other aspects of the device cause this to be 200mw while an apparently identical device previously granted is 100mw? Please explain.
6. Please note that the rf exposure states 15.407. The device operates under 15.247. Please correct your MPE report to reflect this device.
7. Please note, certain documents claim that this device is professionally installed (MPE report). While this device may actually only be sold and installed in this type of configuration, it is after all a PCMCIA card usable in any PCMCIA slot. Professional installation indicates that a one time installation process is involved. Please note that a PCMCIA format card is intended for repetitive or at least multiple installation and reinstallation. What is to prevent the user from using this PCMCIA card a laptop or other non professionally installed applications, etc.? For example, is the PCMCIA card blocked via BIOS (can only certain configurations use this device and all other applications not use the device? – how is this possible?) Please explain how it is possible for this PCMCIA card to be limited to professional installations as indicated. Alternately, while it is may actually be sold and installed in the manner indicated, the grant for the device would not contain a note for professional installation, please correct the MPE report to remove any indication of professional installation.
8. The manual appears to have conflicting MPE distances listed. In the RF exposure statement (Page 1) it states installation of an antenna of 18dBi gain is not to be closer than 35cm yet the next statement (The following precautions must be taken during installation of this equipment) states 25cm separation must be maintained. Please correct the manual to be in line with the reported minimum separation distances. Please note also that my calculations show a 35cm separation would be for an antenna gain of 18.75dBi (numeric gain of 75) while an 18dBi antenna would give 32 cm separation.

Dennis Ward

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.