



April 20, 2005

RE: FCC ID: RFM-ACCESS-ONE-O3_ATCB002314

Attention: Leon Kogan

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1. FYI – no action needed. As no DFS or TPC is required for the frequencies listed on the 731, there is no reason to provide a DFS/TPC attestation letter. These aspects require testing when needed and not attestation.
2. Please note that there are some exhibits that are not able to be held confidential. Please also note that exact exhibits must be defined in the request for confidentiality. Please define the term “any associated text descriptions”. What does this mean? Please be specific in addressing confidential exhibits.
3. Please note that while you have provided an attestation that the 15.407 device will discontinue transmission when there is no data, you have not provided the required operational description of the device. This operational description should include a description of the 15.247 device as well. Please provide the description for the 15.247 device.
4. The MPE report addresses the instance where one device is transmitting. However, while the manual states that the installer should insure that the radiation patterns do not overlap, MPE for all transmitters transmitting simultaneously does not appear to have been addressed. Please explain.
5. Please note that section 4.1.6 states that the EUT was operating in 802.11/b/g/ mode. Please note that the data only shows/indicates one 802.11b/g radio was transmitting. Please note that as the device can transmit with the 802/11 a device and the 802.11b/g devices transmitting, conducted emissions should be done with all three transmitters in both a and b/g. Please provide evidence that this was done.
6. Please note that your PPSD plots for the 2.4GHz band were not done correctly. Please follow the accepted test procedure for PPSD. This would be with an analyzer res BW setting of 3kHz, a video bandwidth setting = or > the res BW and a sweep time that is equal to Span/3k (usually a span of 1.5 MHz and a sweep time of 500 seconds is used). For the span used in the plots shown (50MHz) the sweep time would have to be 16,600 seconds.
7. FYI – no action needed. Please note that when making video average measurements the video bandwidth of the analyzer can be set to 10Hz. In the report you state 1kHz but use 300Hz.
8. Please explain how you derived the limits of 68.3dBuV/m and 48.3dBuV/m on pages 21, 33, 48 and 52 of part three of the report.
9. Please address the issues in 15.247(c)(2) for the use of multiple antenna(s).
10. Please note that band edge compliance for 15.407 devices are not performed using the same limits or requirements as 15.247 (i.e. the limit is not -20dBc but must be an EIRP measurement in accordance with 15.407(b) requirements). Please show evidence of compliance to the EIRP requirements of 15.407(b) for all UNII transmitter ranges certified under 15.407. Please show EIRP calculation formulas and examples.

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.