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FCC: UI3S1613-01  
IC: 140L-S161301  
ATCB: 3926

In response to your comments dated 4 Sep 2006 regarding the application for certification of the devices referenced above please find our responses below:

|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| 1:  | Photos, Internal - Please confirm that there are no additional boards in the device other than those already photographed. Additionally please provide pictures of the display (rear)                                                                                                                                                                                                                                                                                                                                                                                                                     |
|     | <b><i>Additional photographs taken and uploaded for review. This includes the rear of the LCD display module.</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 2:  | 2.4 GHz Peak Transmit Power: The peak transmit power in the report indicates it was measured in a radiated test setup using a 1 MHz RBW. The peak transmit power recorded should be the total channel transmit power, thus this 1 MHz power reading should be adjusted for the actual channel bandwidth. This can be measured with a peak power meter or using a spectrum analyzer with a "integrated channel power" function. This would be Method #3 in the attached FCC Public notice. Note that the attached public notice (DA-02-2138) outlines the acceptable methods for measuring the peak power. |
|     | <b><i>Report amended with all conducted method power measurements with peak power meter. Radiated field measurements of power removed.</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| 3:  | 5.15-5.25 GHz: Transmit power: The limit for peak transmit power in this band is 50 mW ( or 4dBm + 10Log BW 26MHz) Please clarify the limit of 17.8dBm used in the report.                                                                                                                                                                                                                                                                                                                                                                                                                                |
|     | <b><i>Limit was from previous document and has been corrected.</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 4:  | 5.15-5.25 GHz PSD: The limit for PSD in the 5.15 to 5.25 GHz band is 4 dBm / MHz. Please revisit the PSD measurement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|     | <b><i>PSD for this band re-measured using conducted method and report revised accordingly.</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 5:  | 2.4 GHz B & G band edges, restricted band emissions: Please provide data showing compliance with emissions in the restricted bands from 2410 - 2390 MHz and 2483.5 - 2500 MHz, rather than simply the edge of the band. (Please provide for B & G modes). Also please note that restricted band emissions are supposed to be measured in PK (1M RBW / 1 M VBW ) and AVG (1M RBW / 10 Hz VBW ) modes                                                                                                                                                                                                       |
|     | <b><i>Emissions measured using radiated method and results added to report.</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| 6:  | Indoor Operation: Per 15.407 (e) operation in the 5.15 - 5.25 GHz band is restricted to indoor operation only. Please add a statement to the manual informing the users of this restriction.                                                                                                                                                                                                                                                                                                                                                                                                              |
|     | <b><i>Warning incorporated into user guide, revised guide uploaded for review.</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 7:  | Emissions Investigation: Please confirm that the band up to 25 GHz for 2.4 GHz and 40 GHz for 5 GHz was investigated and the investigation was not limited to harmonics of the fundamental.                                                                                                                                                                                                                                                                                                                                                                                                               |
|     | <b><i>Measurements were performed as required, report amended accordingly.</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 8:  | Pk Excursion: Please provide data showing compliance with 15.407(a)(6) Peak Excursion must be less than 13 dB                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|     | <b><i>Measurements were repeated using conducted method and incorporated into the report and viewable as plotted data.</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| FYI | Several places in the report reference a peak transmit power limit for the 2.4 GHz band (15.247) as being 21 dBm. Assuming an antenna gain of less than 6 dBi, the peak power limit is 30 dBm.                                                                                                                                                                                                                                                                                                                                                                                                            |
|     | <b><i>Antenna gain is 0 dB, limit revised to 30 dBm throughout revised report.</i></b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

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