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

April 8, 2003

RE: Accton Technology Corporation

FCC ID: HEDWA6101BACC

I have a few comments on the above referenced Application.

1) The RF exposure shows separate calculations for each mode of operation (802.11b, 802.11a, 802.11a turbo, etc.). Please explain if this device (under normal use by the user) may transmit simultaneously using both 802.11b and 802.11a. If so, please update the RF exposure to show the composite RF exposure condition which can occur.
2) Conducted emissions appear to only have been performed with the AC adapter. Please provide data or additional information showing compliance when powered by POE.
3) The antenna appears to contain 2 RF cables, one for 2.4 GHz and one for 5 GHz. Is the internal construction of the antenna actually contain 2 separate antennas, or is there a shared antenna internally. Note that a shared antenna would suggest a concern with mixing of both the 2.4 and 5 GHz signals, therefore created inter-modulation concerns if they operate at the same time and share the same RF antenna.
4) Only one set of powerline conducted emissions was provided for the UNII band. Please explain if various channels were investigated, normal and turbo modes investigated, and POE for the UNII band in effort to obtain the worse case results. Additionally, if the end user is expected to be able to use both the 802.11b and 802.11a simultaneously, then this mode should also be checked.
5) Page 63 & 64 of the test report shows limits that do not appear to match FCC limits. They appear to be 10 meter Class B limits. Please check the test distance and the limits and correct the report.
6) Two frequencies on page 69 (5715/5725) in the lower table are mislabeled as falling in a restricted band. Please correct.
7) Page 30 of 36 of the users manual shows the incorrect frequencies of operation for 802.11b use. Please correct.
8) The power output of page 30 of 36 states the minimum output power is +16 dBm. This is misleading since the maximum output power for 802.11b is +15 dBm. Please correct.

Timothy R. Johnson
Examining Engineer

mailto: tjohnson@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.