



Washington Laboratories, Ltd.
7560 LINDBERGH DRIVE
GAITHERSBURG, MD 20879
(301) 417 - 0220 FAX # (301) 417 - 9069

September 7, 2007

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

RE: Comments of August 17, 2007
APPLICATION: M4Y-0005850 Z-COM Inc.

Dear Mr. Ward:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in ***bold italic***. Many responses refer you to additional exhibit(s) which has been uploaded to the application folder at the ATCB website.

Thank you for your attention. Please feel free to contact us for any additional information that you may require.

Regards,

Steven D. Koster
EMC Operations Manager

Brian J. Dettling
Documentation Specialist WLL Project: 9760

1) Please note that the UNII bands do not extend from 5150 to 5825MHz in a continuous band. Please correct the 731 form to show the actual frequency bands associated with the device.

R. The 731 form has been corrected.

2) Please provide a cover letter stating the purpose of the permissive change.

R. The letter has been provided. Please see “Change - DFS Letter”:

3) Please note that while the device may be powered via "Power Over Ethernet (POE)" this in itself does not alleviate the necessity for conducted emissions. Please remember that a long standing interpretation of the FCC is that if a part 15 device derives its power directly from an ac source or from a source which is eventually connected to an ac source, then conducted power would be required. Please explain and

please properly justify why conducted emissions was not performed. One such justification may be that since this is supposedly only a PC to add antennae, no conducted emissions is needed.

R. Please see “Change - DFS Letter”.

4) FYI- please note that this device was originally granted in 2002 when DFS was not required for the 5250-5350MHz range. Please note that no PC appears to have been done to justify the device use in DFS bands or to remove the 5250-5350MHz bands. Please note that if this device still operates in the 5250-5350MHz band and has not properly been tested to comply with the DFS rules, the device may be illegal. Please address this situation.

R. Please see “Change - DFS Letter”.

5) Please note that in line with the fyi above, it may not be possible for a TCB to issue a PC2 on this device until the DFS bands have been properly addressed. A question to the FCC has been sent in this regards.

R. Please see “Change - DFS Letter”.