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

September 2, 2003

RE: Airspan Networks

FCC ID: PIDAIRSPAN

After a review of the submitted information, I have a few comments on the above referenced Application.

1) The FRN Number provided (0009320326) appears to be invalid from checking on the FCC website. Please provide a correct FRN number for Airspan Networks Ltd.
2) It is uncertain what the difference is between the SPR and BSR models and whether they should be approved under a single FCC ID. Please provide further information regarding the differences between these 2 devices. A quick comparison seems to show that they utilize different antennas, and that the BSR contains an additional adapter for converting the sex of the input connectors. However, it also appears that the 2 devices have a different power output. If each device is manufactured with a different output value as well as each uses its own antenna configuration, these devices should be submitted under 2 different FCC ID's. This is due to the fact that the maximum measured power gets reported on the grant, and it actually appears that this will be different for each model.
3) Please note that the FCC no longer desires that the safe distance for mobile devices (devices installed such that 20 cm will be maintained between user and the antenna) be calculated in the RF exposure exhibit if the safe distance is < 20 cm, but instead prefers the power density results to be calculated and compared to the power density limit. Fixed devices (devices installed such that a 1 or 2 meter distance will be maintained between the user and the antenna) may be calculated for distance. Although the RF exposure exhibit mentions mobile, it is uncertain which category the device is being classified because of the 25 cm listed in this exhibit. Note that devices classified as mobile are listed as 20 cm. Please provide an updated RF exposure exhibit corrected as necessary.
4) If this device is classified as mobile, then the distance shown on page 31 and 131 of 229 should list 20 cm instead of 25 cm. However, given the nature of the device and the fact that additional antennas may be added (including higher gains - also see items 6 & 7 below), it may be best to classify these devices as fixed which would specify a 1, 1.5 or 2 meter distance dependent on expected conditions. Doing this will avoid any future Permissive Change application problems where TCB's are not allowed to process applications that add or change the RF exposure conditions (mobile, fixed, portable), which appear to be possible with higher gain antennas.
5) The users manual does not appear to include the information required by 15.21. Please adjust.
6) Section 4.6 of the users manual mentions the addition of an external antenna for certain model BSRs and section 8.1/8.5 mentions a similar possibility for SPR's. These model do not appear to be covered under the scope of this application and will therefore have to be addressed at a future time either as a permissive change or possibly a new certification. Additionally, please note that this application has not provided any justification for professional installation, although it appears that the external connectors (for the model BSR with external antenna connection) will not use non-standard connectors and will therefore require professional installation. Note that if professional installation is only required for certain models, these models must usually be submitted under a new FCC ID so the FCC can track these models separately. However if it is expected that these models may be added to the current application, professional installation should be addressed currently.
7) Section 8.1 of the users manual mentions SPR's with a capability of up to 18 dBi. This does not appear to be addressed by this application. Please explain.
8) Section C-11 of the users manual appears to mention the SPR with an output of 27 dBm which is higher than the 20 dBm listed in this application. Please explain.
9) FYI……The SDA or BSDU appear to normally connect to a computer and may therefore be considered a class B PC peripheral subject to the labeling and user manuals for a DoC.

--- Continued on Next Page ---

10) FYI…This application does not address other models such as PPR and IDR listed in the users manual.
11) Note: Due to various concerns above, the test reports and some technical information have not yet been reviewed. Please help address the information above as soon as possible, so the remaining information can be appropriately reviewed.

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.