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

August 30, 2005

RE: Electronic Lifestyle Integration Inc.

FCC ID: S2701180025-ELI

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

1) The block diagram should show the frequencies of all oscillators in the TX portion of the device (CFR 2.1033(a)(5)), unless this portion of the device is an OEM part from a different manufacturer. Please provide either the block diagram for the TX portion, or alternatively provide a parts list that clearly shows this part and the manufacturer of the part is different than the applicant. Please update the list of confidential exhibits if necessary for any parts list provided.
2) The schematics do not include the TX portion of the device. Note that a schematic for the TX portion of the device is required as specified 2.1033(b)(5) for the RF section. Please provide either a schematic for the TX card or as an alternative, you may provide a parts list that lists that shows that this part is provided by another manufacturer. If necessary, please update the confidentiality letter to include the parts list.
3) Section 15.15(b) prohibits adjustments of any control by the user that will cause operation of a device in violation of the regulations. Accordingly, any proposal to allow the end user to choose extended channels on frequencies outside of an allowable frequency band in the USA is not acceptable. For example, a WLAN device operating according to Section 15.247 on channels 1-11 between 2.4 - 2.483.5 GHz must not have any user controls or software to allow the device to operate on channels 12 and 13 which are outside of the allowed USA band. For instance, the user should not be able to select alternative countries which would allow different channel plans outside of the allowed USA band. Please explain how this device is compliant to this requirement.
4) Please clarify if you are asking for:
    a) Certification of the device as a TX, and a DoC has been performed by an appropriately accredited test lab for a PC
    b) Certification as a TX + PC

    Note 1: The option b) would be considered as a composite application and 2 certificates (one for the TX, one for the PC portion) would be issued. There are additional review costs associated with this additional certification.

    Note 2: To qualify to perform DoC applications, the test lab must be accredited by an acceptable agency and meet the requirement of 2.948(e) to perform testing under the DoC procedure and the device has additional labeling and manual requirements for the DoC. Currently labs from China do not appear as an accredited test lab on the FCC site under 2.948(e). Please explain as necessary.

    Note 3: Note that for DoC tests, the device is configured with a minimum test configuration as specified by ANSI C63.4 which includes complete computer + 2 I/O devices attached (one may be the EUT).

    Note 4: For the remaining part of this current review, it is assumed that the device is being approved under a DoC for the PC portion.
5) Please explain compliance to 15.203. Antenna information shows a standard SMA connections which is not allowed.

6) The RF exposure information contained in the users manual should also provide a 20 cm mobile explanation such as:
   The antenna(s) used for this transmitter must be installed to provide a separation distance of at least 20 cm from all persons.
7) The users manual appears to be missing the required information for 15.105 as appropriate. Please update.
8) The test report mentions 4 different models without an explanation as to the differences between these models. Please provide further detail to show how this application can be considered to cover all models.
9) The plot on the top of page 23 and 24 shows an odd waveform. There appears an artifact in the waveform which is very unusual. Please review.
10) The spectral density appears much lower than expected. This will likely occur if you are not using the slowest data rate for these tests. Please review. Please note that in generally the FCC expects the worse case data for all tests to be provided. Each test may have a different mode of operation which causes worse case results.
11) Page 45 mentions measurements < 1 GHz were made at 10 m. However limits appear to be shown at 3 meters and test photos seem to support 3 meter. Please explain at what distance measurements were made and if made at 10 meters, where are correction factors applied.
12) Page 46 mentions measurements > 1 GHz were made at 10 m. Due to FCC rules, limits, and dynamic range issues this is highly unusual. Additionally, limits are cited as 3 meter. Please explain.
13) Data on page 55 shows peak data in excess of the average limits. Therefore average data for this must also be provided.
14) No emissions appear to be reported above the fundamental level of the TX frequency. Please explain.
15) Please explain why test photos in report appear different than test photos provided in a separate exhibit.
16) FYI….If this device is also subject to a DoC, the users manual should contain all the following information on a single page. This information does not appear to be provided together in the manual as specified by 2.1077.

COMPLIANCE INFORMATION (47CFR 2.1077)

If a product is tested and authorized under a Declaration of Conformity, a compliance information statement shall be supplied with the product at the time of marketing or importation, containing the following information on a single page:

(1) Identification of the product, i.e. name and model number.

(2) A statement similar to that contained in Section 15.19(a)(3) that the product complies with Part 15 of the regulations.

(3) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.

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.