



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

June 21, 2007

RE: Inventec Besta Co., Ltd

FCC ID: U6OKA015Z1

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Please provide a corrected Confidentiality Request letter and Agent Authorization letter signed by the appropriate parties at Inventec. The FCC website lists Yuan Young Chang as the contact window. This is the only officer of Inventec recognized by FCC.
- 2.) Please note that unless you can show that the antenna for this device is 20cm or more away from all persons, SAR testing may apply. Please review this filing with our Customer Service specialists.
- 3.) This device appears large enough that the two-part statement of 15.19(a)(3) should appear on the device. Kindly review.
- 4.) Your Operational Description calls this a 'CF Wireless LAN Card'. This does not appear to be correct. The Application is written so that the FCC ID: will apply to the entire device, not just WLAN card. Please advise.
- 5.) Please describe how the "Regulatory Domain" is set (language from Operational Description), and tell us if the end user can access these settings.
- 6.) Please note that Canada RSS numbers need to always specify the issue number. Please review. Only the most recent issue should be used for any filings.
- 7.) All your band edge plots using average detection are skewed because of excess sweep speed. Please re-take your average data plots using a much slower sweep time. In addition, the plots provided on pages 41-48 are "postage stamp" size and are simply not readable. Larger, readable plots are, by necessity, required.
- 8.) It does appear that the equipment was in the "worst case" positioning when the radiated restricted band measurement was performed. Using your own Pout data, the published antenna gain, and estimating field strength for a 3M test range, I would expect your +16dBm radio to create at least a peak field strength approaching +110dBuV. Your "postage stamp" plots are not even +97dBuV. Please explain in detail.
- 9.) In addition to three channels, FCC requests that RF Pout be investigated over all applicable bit rates. Please provide a chart within your test report of RF power over data rate from 1 to 54MB/sec. The setting which produces the highest Pout in both 802.11a and 802.11b modes can be used for radiated spurious testing – including radiated restricted band test.
- 10.) I do not find any radiated spurious test result data above the fundamental operating range of 2.5GHz. FCC rules specify that radiated data for all Unlicensed intentional radiators be performed to the 10<sup>th</sup> harmonic. I see no evidence of compliance within section 3.6.2. Measurements within 20dB of the limit should be reported. My expectation is that at minimum measurements within the restricted bands of 15.205 would be reported if within 20dB of the limit.
- 11.) A ferrite is shown on the USB cable feeding the EUT in the Test Setup photos. Is the ferrite required for EMC compliance?
- 12.) The FCC regulatory information listed in the manual is incomplete. We need to add the 15.21 "Information to User" statements, and any appropriate RF Exposure warnings. If SAR test is required, please remember to place the tested values within the Manual too.
- 13.) Please provide details as to what is available to the end user for WiFi RF setup. I find only a very small reference within the Manual.

- 14.) Please justify the use of an MPE exhibit if the antenna for this device is less than 20cm to the body in typical usage.

A handwritten signature in black ink, appearing to read 'William H. Graff', with a stylized, cursive script.

William H. Graff  
President and Director of Engineering

[mailto: whgraff@AmericanTCB.com](mailto:whgraff@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.