



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

July 18, 2006

RE: Nanjing Z-COM Wireless Co., Ltd.

FCC ID: UDKZA5000D

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

- 1) The design of this unit and intent is for use outdoors based upon its design and use. It is our understanding that if a device is designed for outdoor use or utilizes outdoor antennas, the FCC has not allowed the device to be approved to operate on 5150-5250 MHz. There is nothing to stop the user from using the 5150-5250 MHz band. You can simply not rely on users instructions for this. This application appears to still include this band of operation. Please correct all necessary exhibits to remove use of the 5150-5250 MHz band (731, manual, test report, RF exposure, etc.). Note that information throughout the manual would need to be adjusted. The concern is that regardless of where it is installed, there is nothing to stop the user from using the band. Please call Major to discuss further as necessary.
- 2) This devices appears to be capable of TX simultaneously from both TX's. Therefore, worse case RF exposures for both antennas should be added together and show that the total RF density from both antennas is in compliance with the limits. Please correct.
- 3) Something is clearly incorrect with the results given in 14.5. First when the limits are conducted they need to be adjusted for the worse case antenna gain since the limits are in EIRP. For example $-27 - 6 \text{ dBi} = -33 \text{ dBm/MHz EIRP}$. Radiated would already include the antenna and would be given as in the previous comments. Second, the results are way too low for conducted results. For instance, the fundamental using the settings given is expected to be over 0 dBm (see power results which use similar settings). The results appear to be 30 – 40 dBm below what is expected.
- 4) Please explain compliance to 15.407(c).
- 5) The users manual pages 11 & 12 suggest the user can select the region of operation. Devices sold in the U.S. are not allowed to have this function. Please explain.

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Examining Engineer

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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.