



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

July 13, 2006

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

FCC ID: UDKZA5000I

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

- 1) Please adjust 731 for section III – 4 (a) to Nil. DSS is only for frequency hopping systems.
- 2) This device is for outdoor use and information throughout the application explains use in the 5150-5250 band. Please note that 15.407(e) restricts use of this band to indoor use only. This device is clearly not intended for indoor use. 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.
- 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. Additionally, the ability to select a different region other than USA is also 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 for all bands of operation. Additionally, please explain compliance to 15.15 (as given above) for the 5150-5250 MHz band.
- 4) The TX portion of the device appears capable of 2.4 GHz TX. Please explain given the application only covers 5 GHz.
- 5) Operational description should be a short description of what the device is. Information provided does not appear to explain this. Please correct.
- 6) RF exposure appears to cite 6 dBi antenna. Given the nature of the device, direction and nature, and information in the manual, it appears that one antenna may be 23 dBi. Please review and correct the RF exposure as necessary.
- 7) The unit appears to be positioned on its back for all tests. One of the antennas is directional in nature (internal antenna). Testing of the directional antenna for radiated tests requires the unit to be positioned in an upright position in order to measure the main beam of radiation. If not tested properly, radiated testing from this antenna must be retested since the main beam of the antenna was not positioned to obtain worst case. Please review/correct.
- 8) 5 GHz radiated data was provided only for center channel in each band. Testing is required for a Low and High channels for each band as well. Please provide.
- 9) Limits of -17 and -27 dBm/EIRP are actually a conducted limit. It appears that these were measured radiated. Therefore the levels must be adjusted for radiated. These would equate to the following limits: -17 dBm = -28.8 dBm @ 3m, -27 dBm = -38.8 dBm @ 3m. Note some emission appear to exceed these values.
- 10) Please explain compliance to 15.407(c).
- 11) Users manual shows capability in bands other than can be covered by this application (channels 36 – 48, 5180 – 5240, see above). Selection of this band may not be allowed. Please explain compliance to 15.15 and also correct the manual as necessary.
- 12) FYI....Data relating to 5150-5250 MHz has not been reviewed due to the concerns above.

- 13) FYI....It would be helpful to identify which method is used for various RF conducted tests per the attached procedures. Please consider adding this information in the future.
- 14) FYI....5 GHz PSD requires > 1 MHz VBW. Please correct in the future.



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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.