



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

May 31, 2002

RE: FCC ID: IMRWA1000

Attention:

I have a few comments on this Application.

- 1 The device as tested and as shown in the photos is marketed in a plastic case using USB interface technology. It is therefore a computer peripheral and a transmitter. And while the transmitter may have its own shielding, buffering and regulation, the product is not strictly speaking a modular transmitter as defined by the FCC. However, the transmitter may be certified as a limited modular approval. This means its use is restricted to the Compaq Laptop. xx
- 2 Since the transmitter comes packaged in a plastic case, please explain why the FCC ID label is not on the outside of this case. The label appears large enough to accompany the two-condition statement specified in 15.19. Section 1.6 of the report states that this two-condition statement will be placed on the label. Please provide a clear drawing of the label with the proper 15.19 two-condition statement. If the label is placed on the inside of the transmitter, the laptop in which it is used must carry a FCC label stating the ID number of the WLAN device. xx
- 3 While the information you provided in your request for approval states that, "The Product has no connector for connection to external antenna", the operational description states that an external antenna can be used on this device. The photos show the existence of this connector and with slight modifications to the plastic case it is fully capable of feeding rf to an external antenna. The jack does NOT appear to be a unique connector, thus not meeting the antenna requirements of part 15. Also, it is apparently against the intent of this device to use a professionally installed antenna. Please explain the measures that the manufacturer will take to insure that the case is not modified to allow use of this connector. A Statement to the effect that the case will never be modified to allow access to this rf connector and that the board will never be placed in case which would allow access to this connector should be sufficient. xx
- 4 Your reports give no indication that you have considered the cable loss, antenna factors or pre-amp factors in your measurements. Please provide evidence that the readings provided in your report include all necessary factors. xx
- 5 The manual does not contain the appropriate FCC statements. The Users manual states, "refer to 'Information to the User' for more regulatory information that may apply in your country. No such 'flyer' was provided. The manual must contain an rf exposure statement restricting use to more than 20cm separation from the body and no co-location with other antennas. Please correct the manual to include the warning statements concerning unauthorized modification could void the users authority to operate the equipment (15.21). Please correct the manual to include the 15.105 information to users information. xx

Dennis Ward

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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.