



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

July 20, 2005

RE: SerComm Corporation

FCC ID: P27WIAD1X

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 shows that this part is provided by another manufacturer. Please update the list of confidential exhibits if necessary.
- 2) The schematics do not include the TX. 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. Please provide either a schematic or parts list as specified. If necessary, please update the confidentiality letter to include the parts list.
- 3) The users manual shows you can select the region of the world and provides information in regards to this (page 21, 22, 100, 104). This is not allowed for devices shipped to the U.S as the end user is not allowed to have this freedom. Additionally the selectable channels may only be for channels approved for use in the U.S. Please explain how the device is compliant and adjust the manual as necessary.
- 4) 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.
- 5) Many of the radiated results show a difference between Peak and Average values above 1 GHz of close to 20 dB. Typically the difference between peak and average on this type of transmitter is only 10-12 dB, regardless of 802.11b or 802.11g. The larger delta for the 802.11 b tends to suggest that maybe the fundamental was not configured properly for continuous transmission during this test and possibly a larger VBW should be used. Note that for the average measurements to be considered valid the VBW must be $> 1/T_{on}$ time. Another possibility may be that the peak readings are taken with too large of a span to adequately capture the true frequency such that when the spans are zoomed in for average measurements the frequency of interest is totally missed. Please explain, verify, or remeasure as necessary.

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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.