



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

October 7, 2003

RE: ZyTel Communications Corporation

FCC ID: I88B120

I have a few comments on this Application.

- 1.) Unless the marketing of this device will be restricted to OEM integrators only, this PCMCIA form factor device is considered, according to latest RF Exposure interpretations, an RF category "Portable" device. Since the power is above 60mW/f(GHz), a SAR report will be required. Please submit at your earliest convenience. As a caution, please remember that RF category "Portable" equipment are not eligible for full modular approval.
- 2.) Please explain why approval as a Modular device is being sought.
- 3.) The Manual will have to be altered to remove the 20cm restriction. This is incompatible with RF category "Portable" Applications which include a SAR report.
- 4.) Please also note that general purpose WLAN cards are not appropriate for Class A limits. The Test Report indicates Class B limits, but the Manual incorrectly quotes Class A.
- 5.) Is this device to be used by OEM integrators only? Please see Manual.
- 6.) Is this device capable of transmission on 802.11b channels 12 and 13? Please explain.
- 7.) FYI: Depending on your response to the above questions, additional requests for information may be required.

William H. Graff
President and 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.