



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

December 13, 2005

RE: ZyXEL Communications Co.

FCC ID: I88G260

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) The RF Pout on Form 731 is listed as 89mW for 802.11b and 160mW for 802.11g. Is their possibly a typographical error? Usually the slower data rates of 802.11b provide higher power than any 802.11g. Please re-check your data again.
- 2.) The RF Pout specifications in the Manual (pp. 56) also are not in agreement with the Form 731. It simply seems unusual for a device to have a conducted RF Pout 3dB above the specified power.
- 3.) Since a SAR report has been provides, FCC requires the Manual to show the measured SAR values. Kindly indicate where I can find this information
- 4.) Again, the SAR report indicates that the highest value was found in 802.11b mode (pp. 3). Usually the highest Pout will produce the greatest SAR values. Please review your data.
- 5.) Please refer to Section 1.0 of the SAR report. Are you supplying a Pout measurement, or simply assuming the manufacturer's declared power is true?

William H. Graff
President and Director of Engineering

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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.