



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

September 22, 2002

RE: AboCom System, Inc.

FCC ID: MQ4WB1K5S

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

- 1) The revised users manual presents information for both end users and also for access point manufactures. There are different concerns for each of these uses (end-users vs. access point manufacturers) and will actually require 2 separate FCC ID numbers due to different RF exposure conditions, end use configurations, and modular approval access point applications. Please see the following concerns.
  - a) End Users: It is not clear how an end user (a typical everyday user) is expected to use this device with 2 antennas on short cables coming from the EUT. This poses several RF exposure concerns. How is an end user be expected to position the antennas (for instance there is no mechanical device provided for holding the antennas) if they were to use a laptop computer while positioned in their lap? It is not certain how this may be marketed to an end user given the nature of external antennas. The FCC is very concerned with how a device is to be used, especially in portable applications. Specific information is required in order to evaluate RF exposure conditions such as typically uses, placement of antennas, power outputs, etc. Simple instructions to the user are not usually sufficient for this type of product. Please explain and provide further details.
  - b) Access Point Manufacturers: If this is designed for integration by access point manufactures, then it must be approved in a modular fashion (otherwise the integrators MUST certify their entire device, including the transmitter). If AboCom System, Inc. desires a modular approval, then a cover letter addressing all the modular requirements must be submitted (please see 1<sup>st</sup> attachment). Additionally, for radiated emissions, the device would have to be tested in a fashion out in the open (for instance on a PCMCIA extender card). The users manual should also be updated for various issues (see 2<sup>nd</sup> attachment). Please note that access points are typically considered mobile devices with 20 cm spacing.
- 2) FYI, Due to concerns with how to treat the device for RF exposure, as well as if the device was properly configured in a stand-alone configuration for radiated emissions, we have not yet reviewed the measurement report portion of this application. Please provide information regarding the above issues as soon as possible.

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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](http://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.