



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

July 21, 2005

RE: SerComm Corporation

FCC ID: P27IP906SM

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

- 1) The 731 form should be updated to list both DTS and NII equipment codes as the NII is applicable to the 5150 – 5350 band of operation.
- 2) The 731 form should list actual tunable frequencies for Part 15 devices, not simply ranges of operation. Please correct for the 5 GHz bands.
- 3) The 731 form states a low frequency of 5125 MHz. This is below the FCC allowed band of operation which starts at 5150 MHz. Please explain.
- 4) The users manual appears to show in the graphic section that you can select the region of the world (page 22). 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.
- 5) The output power given on page 102 of the users manual is not consistent with the information presented in the application. The power information must be consistent throughout the application. Please review/correct as necessary.
- 6) 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.
- 7) Test equipment for 5 GHz report section 5.4 does not appear to support measurements up to 40 GHz. For example, what amplifiers or other device were used in the range above 26.5 GHz. How was effective dynamic range achieved for higher frequency measurements (closer distances, etc.) Please review.
- 8) Information to the user regarding compliance to 15.407(e) could not be found in the users manual. Please adjust.
- 9) Information regarding compliance to 15.407(c) could not be located in the application. Please provide.
- 10) For 5 GHz peak power and PSD tests following the UNII procedure public notice (see attachment), it would be helpful to define which procedure was used for each of these measurements in the test report. It appears that method 3 was used to measure power. Which method was used for spectral density? If method 2, was power averaging (not video averaging) utilized? Please confirm.
- 11) Power spectral density results following UNII procedures appear over the FCC limits for all measurements made. Please review. Additionally, when reporting final measurements, please compare the results obtained to the limit.
- 12) Why does the power measurements between sections 6.3 and 12.3 differ for the high 5 GHz band. The method for UNII and DTS power measurement method 3 is the same (see attachments). Please review/explain/correct as necessary.

- 13) FYI..... The users manual appears to be missing the following information as required for a DoC authorization. Please ensure this information get integrated into the users manual:

COMPLIANCE INFORMATION FOR DoC AUTHORIZATIONS (47CFR 2.1077)

If a product is tested and authorized under a Declaration of Conformity, a compliance information statement shall be supplied with the product at the time of marketing or importation, containing the following information on a single page:

- (1) Identification of the product, i.e. name and model number.
- (2) A statement similar to that contained in Section 15.19(a)(3) that the product complies with Part 15 of the regulations.
- (3) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.



Timothy R. Johnson
Examining Engineer

[mailto: tjohnson@AmericanTCB.com](mailto:tjohnson@AmericanTCB.com)

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.