



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

August 5, 2005

RE: ZyXEL Communications Corporation

FCC ID: I88G-220F

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

- 1) For AC Powerline conducted emissions, the cable appears to not be properly configured per ANSI C63.4. Please review and correct.
- 2) Output power in the manual page 52 & 63 appears much lower than tested. Please review/correct as necessary.
- 3) SAR report does not appear to define the sample as production unit or identical prototype. Please review.
- 4) The SAR validation appears to be done a different day than the testing (7/24/05). Validations must be performed with the same 24 hour period as the testing. Please review.
- 5) Page 19 and 20 of the SAR report appear to contain conflicting information. One page suggests the lowest measurement point was 3.5 mm, while the other was 5 mm. Please explain
- 6) Given 4) above, and that the probe angle to surface normal line is > 30 degrees, it is unsure how the testing met the Following: If the closest point of the probe tip housing to the phantom surface is closer than a probe diameter, the boundary effect may become large and polarization dependent. This additional uncertainty needs to be analyzed and taken into account. Investigation of measurement uncertainty does not appear to take this into account. Please review.
- 7) For the SAR report please explain if probe bound effect compensation was used. If Probe boundary effect compensation is not used the probe tip should be positioned at least half a probe tip diameter from the phantom surface during area and zoom scans. Please explain.
- 8) FYI....This device is also subject to a DoC, but the manual should be updated to place the following specific information on a single page in the manual.

COMPLIANCE INFORMATION (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.

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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.