

On Sep 25, 2006, at 1:38 PM, <charvey-tcb@ccsemc.com> <charvey-tcb@ccsemc.com> wrote:

Tom, I have reviewed the above referenced TCB application and find that the following items need to be addressed before the review can be continued.

1. The Label contains a lower case 'i' which is not allowed in the FCC ID number. Please correct the label exhibit. Also, please provide a Label Location exhibit.

ANS 1 Corrected label is attached, along with label placement photo

2. Also, the Label has an FCC Pt. 15 compliance statement, where the manual does not contain any FCC Pt. 15 Class A information. Please correct this discrepancy.

ANS 2 The manual now references Part 15 as well as EN301 489-1. New manual attached

3. Please provide additional external photographs that show more than a single view of the external appearance and controls/connectors and additional Internal photos showing the PC Board with the RF shields and the back side of the antenna boards. Please update the photo exhibits.

ANS 3 Updated internal and external photos are attached

4. The Antenna Specification exhibit is for an 11.5dBi Flat Panel antenna manufactured by Mti Wireless. The internal photographs show an antenna array of 6 antennas which seem to be different than the Mti flat panel antenna. The Radiated test setup photos (from the report) seem to show a cabled antenna lying on the wooden table.

a. please provide a photograph of the 11.5dBi antenna

ANS4a Photo of 11.5dBi antenna is attached

b. please provide specifications for the 6 antennas in the internal array, ensuring that each of these antennas is identical

ANS4b Antenna specification attached

c. please provide test data for the worst case antenna configuration

ANS4c Harmonic testing is per substitution method using shielded load at antenna terminal. Unintentional radiator testing 30-1000 MHz was worst case when 11.5 dBi antenna and cable was connected to external antenna port, refer to attached letter from SII.

d. please retest with the radiating antenna isolated from the wooden table per FCC testing policy.

ANS4d Same as answer 4c

e. please confirm that only one antenna can transmit at any one time.

ANS4e See attached operational description. Antenna switch chooses only one antenna at a time

f. please update the test setup photo exhibit to include the radiated test photo from the test report.

ANS4f Updated test setup photos are attached

g. Please include a technical description of the Beam switching antenna array of this device in the Operational Technical Description.

ANS4g Technical description attached

5. The Letter of Authorization is dated 9/11/2005, which is over 1 year old. FCC Policy is that letters must be current within 1 year. Please obtain a more recent Letter of Authorization.

ANS5 New agent authorization letter is attached

6. Please provide a tune-up procedure exhibit.

ANS6 Tune-up procedure is attached

7. FCC 2.1055(b) requires the Frequency Stability to be measured at intervals not more than 10 degrees. The measurements in the test report are only provided for the temperature extremes of -5 to +45 degrees C. Please provide the additional compliance data required by FCC 2.1055.

ANS7 New frequency stability test data is attached

8. The test report power section seems to classify this device as a 'Fixed, land or Radiolocation land station' transmitter subject to the power limit of 2000 Watts. Please re-evaluate this classification as the Mobile classification of 27.50(b) (20 Watts) seems more appropriate for this device. Please calculate the EIRP based on the conducted measurements and the stated antenna gains. Please update the test report accordingly.

ANS8 Per KDB response to inquiry, EUT is considered Fixed for EMC purposes and Mobile for RF Exposure.

9. The RF exposure MPE exhibit indicates a 20cm minimum RF safe distance. This RF Exposure guidance is not contained in the BreezeMax CPEs Manual provided. Please update the manual to contain the appropriate antenna installation and use guidance for RF exposure compliance.

ANS 9 RF exposure information is now included, see attached revised manual

10. The FCC requires measurements of 'licensed' devices to be made in accordance with EIA/TIA-603, which includes measurements of Radiated Emissions to be performed using the substitution method. Please document compliance with the EIA/TIA-603 measurement procedure.

ANS 10 Refer to attached letter from test lab confirming substitution method was followed

11. The RF test report for the SI23 incorrectly states that this device has 'N' connectors (the manual states SMA). Please update the report.

ANS11 Reference to N connectors has been removed, refer to updated test report

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee. 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 e-mail address listed below the name of the sender.

Best regards,

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