

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

July 20, 2006

RE: Nanjing Z-COM Wireless Co., Ltd.

FCC ID: UDKZA5000D

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

- 1) The users manual page pdf page 31 & 32 still suggest a much higher antenna gain (23 dBi). Please review/correct.
- 2) Page 46 of the users manual mentions upgrading of the devices firmware. Please explain as any firmware changes should not allow changes to items such as selectable frequencies of operation and region code. These items should be permanently built into the device. If these items are modifiable via software, then the device is also subject to software defined radio rules which can only be reviewed by the FCC (TCB's are not allowed to review applications considered as software defined radios). Please comment.
- 3) This device appears to use a 6 dBi antenna (see report/manual), similar to the UDKZA5000I. However the RF exposure shows 8 dBi. Which is correct? Please correct any affected exhibits. Additionally if the antenna gain is 8 dBi, the bandedge conducted -17/-27 dBm/MHz EIRP may be non-compliant. Please review.
- 4) Please note that the RF exposure still does not show composite RF density (addition of RF density for worse case where 2 transmitters are transmitting at the same time). 2 worse case levels should be added together such as follows. Worse Case TX Density 1/Limit1 + Worse Case Density 2/limit 2 should be < 1.</p>

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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.