



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

August 27, 2004

RE: Airspan Networks (Isreal) Ltd.

FCC ID: PIDAIRSPAN-WIPLL2

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

- 1) Please provide a photograph or drawing that shows the location of the label on the device.
- 2) The frequency band in the operational description mentions 2402-2482 MHz, while the 731 form states 2402-2480, and the frequency hopping lists frequencies from 2403-2481. Which is correct. Please confirm which is correct and adjust the appropriate exhibits.
- 3) Please note that the hopping list does not meet the FCC's definition of Frequency Hopping Systems for pseudo-random as given in 2.1. Also see attached FCC interpretation. The hop sets appear to be incremented by a simple increment and divisor. This is not allowed when approved as a FHSS device.
- 4) AC Powerline conducted emissions (15.107 for digital device, 15.207 while Transmitting) must be shown for the new limits (equivalent to CISPR 22) and in the frequency range of 150 kHz – 30 MHz. This has not been provided.
- 5) There appears to be 2 different models, with different output powers. Please confirm that the user can not adjust the output levels. Also, please confirm that that radios are identical in each model and that the only difference is software.
- 6) The RF exposure suggest that both models have an output power of 23.33 dBm, while the old test reports suggest this is only the case for the model BSR with 11 dBi gain antenna, and the SPR has a maximum output of 18.67 dBm with 15 dBi gain antenna. If the SPR can have an output of 23.33 dBm, then the previous report can not be considered valid for this model as the device was not tested at the maximum output level.
- 7) Given the current RF exposure exhibit, this device appears to exceed the defacto +36 dBm EIRP requirement for the SPR model and is therefore must be limited to point-to-point installations. However given the information in 6) above, this may not be the case. Please explain.
- 8) If the + 36 dBm EIRP is exceeded, the manual must include information regarding 15.247 (b)(3)(iii). Where can this be found?
- 9) The powers listed in the new SPR report are significantly higher than those in the older report (over 3 dB higher). It appears that the test results in the old report may not be considered valid as the EUT must be tested for all tests with maximum output power.
- 10) FYI.....The average time of occupancy is no longer based upon 30 seconds, but $0.4 * \text{the number of channels}$. However calculations of the information provided show that the maximum average occupancy is 400 msec for both 79 and 62 channel modes of operation.

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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.