



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

December 21, 2007

RE: King Champion (Hong Kong) Ltd.

FCC ID: VSAMX200IB0001

I have a few comments on this Application. Depending on your responses, kindly understand there may be additional comments.

- 1.) Please provide a detailed Block Diagram on the WiFi module used with this device.
- 2.) Please provide Schematics of the WiFi module.
- 3.) The external photos are insufficient. It is impossible to read the lettering on the controls and external cabling or ports cannot be determined.
- 4.) I see from the Manual that, at minimum, external earphones, line out, and LAN cable can be attached to this device. Please repeat your Radiated Emissions test with all ports and connectors filled. Kindly refer to ANSI C63.4 for more detailed explanation.
- 5.) Please provide larger, clearer Internal Photos. As a rule-of-thumb, please make sure that all chipset designators can be read on the top of all ICs – anything less is insufficient.
- 6.) Please correct the frequency range on your Form 731. Please note that all 15.247 devices must quote requested RF power
- 7.) Please be advised that duty cycle corrections are not appropriate for devices using WiFi technology unless it can be shown to utilize 'source-based time averaging' exclusively. That means the length of time for the transmission burst is not affected by any factors such as data loading, error correction, etc. In my opinion, duty cycle corrections are simply not appropriate for any WiFi based project. I have yet to see any successfully apply this definition.
- 8.) The Test Report does not show RF power across all data rates in both 802.11b and 802.11g modes. We must also see the RF power across three channels
- 9.) I see no objective evidence of compliance with the radiated restricted bands of 15.205. Most critical is protection of the 2483.5-2500MHz band when this device is set to Channel 11.

William H. Graff
President

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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.