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TCB Review Comments

Date: 15 October 2006
RE: J 64973 Broadcom
FCC ID: (QDS-BRCM1022)

After a review of the submitted information, I have a few comments on the above referenced application. Depending on your responses, kindly understand there may be additional comments. Additionally, if some of the issues / concerns below are not clear, please do not hesitate to email me for clarification.

From previous comments:

2 The C2PC request letter refers to B1 Silicon as having been changed. Please provide a description of the "B1 Silicon" component

Response: B1 silicon is a lower power chip to extend the laptop battery life. The Silicon update has been referenced in generic terms for the following reasons:

- The changes are all inside the Baseband IC and are therefore complex to explain.
- The changes are to correct bugs some of which might include proprietary functionality which is Broadcom confidential.
- The changes do not affect regulatory performance. We perform appropriate regression testing to ensure this.

Given that the changes in the B1 Silicon are inside the Baseband IC, and given that the original the device was CERTIFIED to FCC 15B (The 15B part of the device was NOT covered with a DoC) There does not appear to be any FCC 15 B data (eg radiated emissions from 30MHz to 1 GHz) included in the report. Please outline why 15B testing is not applicable given the changes to the baseband silicon. Or, if required, please provide the applicable data.

Also note that any description of the changes that may be Broadcom confidential may be considered Operational Descriptions and therefore be subjected to FCC confidentiality

2: From the reply to the original comments:

Response: The applicant is aware that the Power, emissions, and Bandedges were tested above what was previously certified. The applicant further stated that the power would certainly be lowered to reflect what was previously approved too. I note has been place in the data to explain this accordingly.

Please indicate where this note is located. I could not find it.

Please note that the above issues were found while reviewing the FCC application. There may be additional questions associated with the Industry Canada review, which will be forwarded once the review has been completed.

David Waitt
Examining Engineer

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Any questions about the content of this correspondence should be emailed directly to the sender.