

## AEGIS LABS INC.

May 1, 2006

RE: Hewlett-Packard Company

FCC ID: B94WM3945ABG

## Answers to the FCC comments on the above referenced Application.

1. Related to 15.204(c)(3), please provide summary of list of all antennas authorized and intended for use under this FCC ID

		2.4GHz Peak Gain	5GHz Peak Gain	Manufacturer/	Antenna Part		Date of	Type of
Antenna	Type	in dBi	in dBi	code name	Number	Status	Approval	Application
HP Altima	PIFA	2.93	2.84	Wistron NeWeb Corporation	EBC-C4	Approved	2/3/2006	Original (Modular)
HP Jakarta 3.0	PIFA	2.96	0.97	Hon Hai Precision Ind. Co., LTD.	CT6	Approved	2/3/2006	Original (Modular)
Heavenly- Mininote	PIFA	2.39	3.14	Wistron NeWeb Corporation	EBC-C	Not Submitted	Not Submitted	Not Submitted
Heavenly- Tablet	PIFA	0.09	3.34	Wistron NeWeb Corporation	EBC-C	Uploaded to FCC		CIIPC (LMA/Portable)
HP Vail 2.0	PIFA	2.95	3.12	Wistron NeWeb Corporation	EBC-I	Approved	4/10/2006	CIIPC (Modular)

- **2.** As stated in several TCB/testlab info/training meetings in last few years, here again are filing guidelines for limited-modular-approval devices installed in various host/final products:
- -General filing guidance for mini-PCI and similar modules, for example in notebook computer:
- --Filings for specific laptop(s) need external and internal-as-installed antenna photos or drawings, to support RF exposure compliance
- --Final-product laptop approvals need laptop user manual describing wireless function, installation/operation, final-product operation, etc.
- --Filings containing multiple laptop models should use LMA
- --Describe integral and/or optional Bluetooth collocations
- --Include laptop DoC info/status in filing
- --C2pc filings to add final-product (host) should include final device FCC ID labeling info, including labels for other modules if applicable.

2a. related to 2.1033(b)(7), please submit external and/or internal photos including antennas and antenna-positions info

Please refer to pages 3- 4 and 24- 26 for antenna diagrams, photos and antenna placement from antenna data sheet file name "Antenna Wistron in Heavenly Tablet-Tablet Rev5\_7a.pdf" sumitted with this application.

**2b.** please submit final-product operating instructions

Please refer to attachments filename "367427-002" and "405775001b"

- **3.** SAR report at section 1.2 mentions a spacing between phantom and product. A standard separation distance to allow for clothing thickness has not been established in FCC Lab SAR test procedures guidance. Notebook and tablet PCs and similar devices are requested to evaluate SAR with final product in contact with phantom. Please re-test any operating configurations and device positions which presently report SAR greater than 0.8 W/kg. Please refer to response in attachment filename "response to comments concerning SAR.pdf"
- **4.** FYI no-response requested we note that SAR data was voluntarily submitted for front-face of final product in contact with phantom; tablet-PCs are requested to evaluate SAR for bottom of keyboard-section (or slate) in contact with phantom, and for edge-on in contact with phantom when product allows screen orientations that for normal use when held/cradled in one arm can place edge with antennas near torso for seated or standing positions.

## No response requested.

**5.** This filing does not appear to presently contain appropriate info to support grantee responsibility for FCC RF exposure compliance. For tablet PCs (both slate and convertible types) which have 0 & 180 deg. landscape and portrait screen-orientation modes, edge of device near or in contact with the user's body is expected to be a normal use position. SAR evaluation is needed for edge(s) of product which contain antennas in contact with phantom (display face normal to phantom), unless transmitting is disabled for those certain display orientations.

Please refer to response in attachment filename "response to comments concerning SAR.pdf"

**5a.** Filing is presently unclear about exact positions tested for SAR, e.g., summary pages in SAR report section 6.5 list DUT position as "Front." Please provide separate exhibit containing only a list of all final-product SAR test positions, and test setup photos showing product placed at phantom.

Please refer to response in attachment filename "response to comments concerning SAR.pdf"

**5b.** Please address FCC RF exposure compliance for tablet edge positions that place transmit antenna(s) in contact with phantom, or provide Operational Description info if final-product prevents transmission in those positions.

Please refer to response in attachment filename "response to comments concerning SAR.pdf"