

Responses:

Item 1. The operational description and the test report refers to the equipment meeting "FCC SAR," however no RF exposure exhibit was uploaded. The application filing is also listed as a non-composite, non-SAR application. Please explain

SAR report to be uploaded soon.

Item 2. The equipment class listed on the 731 form is DSS for both specifications. Equipment class should be DTS for the 802.11 equipment specification. Please verify if this is correct

I was misinformed regarding the 802.11 device. It is a DSSS and therefore should have an equipment code of DTS. The Blue Tooth should remain DSS because BT devices are FHSS.

Item 3. Operational description refers the selling configuration of this equipment with an 802.11 a/b/g card. Form 731 and test report do not reflect this configuration. Please explain

This particular configuration is being submitted via our manufacturing site in Taiwan (Compal Electronics). Compal was unable to support both applications at the same time and keep our initial launch date of 3-15, so this drove Motion to submit the Intel configuration for approval. Compal will not obtain approval for the Gemtek ABG version until 6-15-04. This unit only operates in the b/g modes.

Updated Test report uploaded to support both modes

Item 4. The test report indicates that the frequency range of the transmitters are software controlled. Please elaborate as to how the frequency assignment is restricted to 2400 to 2483.5MHz

The standard Frequency hopping is applied. I believe the software control of the frequency bands is prohibited by the FCC. We do not control frequency bands via software.

Item 5. Please clarify if all operational modes of the 802.11 and the Bluetooth transmitters were investigated, including data rates and modulation types

The unit was tested at full data transfer which was determined to be worst case. Both the b and g modes were tested, please see updated test report.

Item 6. The FCC ID label refers to FCC ID: MXF-M920808G which intimates the mini-PCI card is already certified by the FCC. The form 731 does not indicate that this is a composite device and there is no reference to certification as a system. Please explain and clarify the purpose and scope of this application.

This was submitted as a NEW application. The device is being certified as a system.

Item 7. While the AC conducted test setup photos include the required ancillary equipment per ANSI C63.4, the radiated test setup photos do not include this equipment. Please explain how the test setup satisfies the requirements of ANSI C63.4.

The photos in the test report were to show the testing of the device in three orthogonal plans during EIRP measurements. While performing the EIRP, it is not necessary to have all the peripherals as the power is from the antenna. Please refer to new exhibit for Radiated setup photos.

Item 8. The test equipment used list in section 9 of the test report indicates testing only with a horn antenna. Per the radiated data sheets other equipment was used during testing. Please provide a complete list of the test equipment used for all tests, including AC conducted.

[Please see updated test report](#)

Item 9. 2.1033(b)(4): While the operational description clearly outlines the digital portion of the equipment, the FCC requires more detailed information regarding such items as a detailed description of modulation type, data rates, RF path, antennas used, etc. Please provide an updated operational description

[See uploaded spec files.](#)

Item 10. 2.1033(b)(5): The block diagram must indicate all clocks used within the transmit circuitry for the wireless cards within the computer. Please update the block diagram to additionally include this information.

[See updated block diagram](#)

Item 11. 2.1033(b)(7): The internal photos provided for the wireless cards require more detail. Specifically, all shielding must be removed from the PCBs to show component placement and layout. The “wireless access” portion of the internal photos is missing close-up shots of sufficient detail to show component layout. Please update the internal photos for the wireless cards.

[See Uploaded information](#)

Item 12. 2.1033(b)(7): The front and the back external photos are sufficient, however adequate detail of the sides of the device is missing. Please update the external photos to include photos of all sides of the equipment.

[Please see new exhibit](#)

Item 13. 2.1033(b)(8): The test report does not include any information regarding the peripherals used during testing. Please update the test report to include this information.

[New exhibit uploaded with information](#)

Item 14. The schematic diagrams provided do not appear to include the appropriate information for the transmitter PCBs. Please provide.

[Unable to obtain directly from OEM, are attempting to have the OEM send directly to CKC or Nemko.](#)

Item 15. The users manual does not include any of the FCC required manual statements, such as those specified in 15.19, 15.21, 15.27 and RF Safety Requirements, please provide an updated users manual.

[Please refer to the Safety and Regulatory Guide.](#)

Item 16. General Comment: On many of the pages, the NEMKO emblem is upside down. No action necessary to this item; it just appears strange.

[Error in Adobe, problem fixed in new report](#)

Item 17. Please show the calculation used for determining the average time of occupancy on page 23 of the test report.

[Please see updated test report](#)

Item 18. Please provide information demonstrating compliance to 15.247(h): Hopping Intelligence.

[Will be providing shortly](#)