

Mike Kuo

From: wklo@ccsemc.com.tw
Sent: April 26 2004 年
To: Mike Kuo
Cc: Lai, Harris (E-mail); Scott Wang; CCS-Taiwan, Ting (E-mail)
Subject: 回信 : FW: High Tech Computer Corp., FCC ID:NM8CB, AN04T3855

Hi Mike,

Here are the responses.

Your Question

Your reply to Question #1 is not clear. The applicant has not confirmed that will they market PDA with WLAN .

Our Reply

Attached is a declaration letter, confirming the configuration of PDA with WLAN only will not be marketed.

Your Question

Your reply to Question #4 and #6 is not clear. Based upon technical description submitted, WLAN and Bluetooth CAN transmit simultaneously as described in section 4 of technical description. Please explain.

Our Reply

After confirming with the manufacturer, simultaneous transmission of WLAN and Bluetooth does happen although the interference is actually reduced. Co-location-specific tests with both WLAN and Bluetooth being turned on are performed and their test results are included in the revised test reports - two RF reports and one SAR report.

Thank you for your supports.

Best Rgds,

WK

Mike Kuo <MKUO@CCSEMC.com>

收件人 : "CCS-Taiwan, Ting (E-mail)" <ting@ccsemc.com.tw>, "CCS-Taiwan, Wklo (E-mail)" <wklo@ccsemc.com.tw>

2004/04/25 07:47 AM

副本抄送 : "Lai, Harris (E-mail)" <harris@ccsemc.com.tw>, Scott Wang <SWang@CCSEMC.com>

主旨 : FW: High Tech Computer Corp., FCC ID:NM8CB, AN04T3855

Hi Ting and W.K.:

4/26/2004

Your reply to Question #1 is not clear. The applicant has not confirmed that will they market PDA with WLAN .

Your reply to Question #4 and #6 is not clear. Based upon technical description submitted, WLAN and Bluetooth CAN transmit simultaneously as described in section 4 of technical description. Please explain.

Best Regards

Mike Kuo

-----Original Message-----

From:

Sent: None

Subject:

Hi Mike,

Question #1: This device is portable device which consists of Bluetooth and WLAN transmitters. Two separate test reports are submitted under one FCC ID number and intend to be certified under one radio category (Digital Transmission System - DTS). Please confirm the following :

A. The proposed FCC ID:NM8CB is only applicable for PDA with Bluetooth and WLAN radio installed. Since the applicant has filed another application for PDA with Bluetooth only under FCC ID:NM8CBBT / AN04T3857. PDA with Bluetooth function will be reviewed separately.

Based upon description in the page 49 of user manual, this PDA can be sold as PDA with Bluetooth or PDA with WLAN. Based upon FCC policy, the applicant must be informed the following FCC rules and regulations:

PDA with Bluetooth and WLAN installed : FCC ID:NM8CB

PDA with Bluetooth only : FCC ID:NM8CBBT

PDA with WLAN only : not certified. If the applicant would like to label FCC ID :NM8CB, then BT portion of components can not be depopulated and can only be disabled via firmware by the applicant.

Ans #1: The device is to be marketed with BT and/or WLAN. WLAN is optional and will be removed if the end user does not order one. The wordings on Page 49 have been revised to stress that WLAN is optional. Please refer to the attached user manual.

Question #2: Please provide a clear copy of FCC ID label format.

Ans #2: The clear copy FCC ID label format is attached, please refer to it.

Question #3: PDA in this application is considered as portable device with handheld operation only due the size of PDA and functions described in the user manual. Please remove section 7.7 of test report use MPE estimate to justify RF exposure compliance. During the previous TCB review, I have pointed out many times that do not use MPE estimate to justify RF exposure compliance for portable device. RF exposure condition for portable device is near field exposure not the far field exposure. MPE estimate calculation can only be used to address RF exposure condition for far field exposure. Since the Bluetooth output power is below " low power threshold ", SAR evaluation is not required for Bluetooth portion.

Please delete MPE estimate and submit revised Bluetooth Test report.

Ans #3: The test report is revised for deletion of the MPE estimate. Please refer to it.

4/26/2004

Question #4: In page 6 section 3.5 of test report, "the co-location test is not required because manufacturer has declare to use software to control BT and WLAN function " Co-location test is required when there are multiple transmitters separated less than 20 cm from transmitting antennas. The BT and WLAN are using separate antennas and there is no technical description to justify why BT and WLAN will not be transmitting simultaneously. Please provide strong justification why co-location is not tested.

Ans #4: Please refer to the attached Technical specification. Solution applied to solve the "co-location" issue is described on Pages 1, 3 and 4.

Question #5: Page 15 Body/ permittivity measured value is 51.95 but during SAR evaluation, 51.05 was used. Please explain and provide revised test data/report.

Ans #5: The SAR report is modified. Please refer to the attached.

Question #6: No co-location tests for BT and WLAN transmitting simultaneously. Please refer to question #4.

Ans #6: No "co-location" test is done since appropriate solution is applied for avoiding simultaneous transmission of BT and WLAN. Please refer to Ans #4.

Best regards,
Ting

----- 轉呈者 ting/ccsemc 於 2004/04/26 01:41 PM -----

Mike Kuo <MKUO@CCSEMC.com>

收件人: "CCS-Taiwan, Ting (E-mail)" <ting@ccsemc.com.tw>, "CCS-Taiwan, Wklo (E-mail)"

<wklo@ccsemc.com.tw>

2004/04/23 02:21 AM

副本抄送: Scott Wang <SWang@CCSEMC.com>, Helen Zhao <HZhao@CCSEMC.com>

主旨: FW: High Tech Computer Corp., FCC ID:NM8CB, AN04T3855

-----Original Message-----

From: CERTADM

Sent: Thursday, April 22, 2004 11:16 AM

To: Mike Kuo

Subject: High Tech Computer Corp., FCC ID:NM8CB, AN04T3855

Notice_content

Administrative portion :

Question #1: This device is portable device which consists of Bluetooth and WLAN transmitters. Two separate test reports are submitted under one FCC ID number and intend to be certified under one radio category (Digital Transmission System - DTS). Please confirm the following :

A. The proposed FCC ID:NM8CB is only applicable for PDA with Bluetooth and WLAN radio installed. Since the applicant has filed another application for PDA with Bluetooth only under FCC ID:NM8CBBT / AN04T3857. PDA with Bluetooth function will be reviewed separately.

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PDA with WLAN only : not certified. If the applicant would like to label FCC ID :NM8CB, then BT portion of components can not be depopulated and can only be disabled via firmware by the applicant.

Question #2: Please provide a clear copy of FCC ID label format.

BT Portion :

Question #3: PDA is this application is considered as portable device with handheld operation only due the size of PDA and functions described in the user manual. Please remove section 7.7 of test report use MPE estimate to justify RF exposure compliance. During the previous TCB review, I have pointed out many times that do not use MPE estimate to justify RF exposure compliance for portable device. RF exposure condition for portable device is near field exposure not the far field exposure. MPE estimate calculation can only be used to address RF exposure condition for far field exposure. Since the Bluetooth output power is below " low power threshold ", SAR evaluation is not required for Bluetooth portion.

Please delete MPE estimate and submit revised Bluetooth Test report.

WLAN port of test report :

Question #4: In page 6 section 3.5 of test report, "the co-location test is not required because manufacturer has declare to use software to control BT and WLAN function " Co-location test is required when there are multiple transmitters separated less than 20 cm from transmitting antennas. The BT and WLAN are using separate antennas and there is no technical description to justify why BT and WLAN will not be transmitting simultaneously. Please provide strong justification why co-location is not tested.

SAR / WLAN portion :

Question #5: Page 15 Body/ permittivity measured value is 51.95 but during SAR evaluation, 51.05 was used. Please explain and provide revised test data/report.

Question #6: No co-location tests for BT and WLAN transmitting simultaneously. Please refer to question #4.

Best Regards

Mike Kuo

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee. 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 e-mail address listed below the name of the sender.

4/26/2004