

From: jonson@ccsemc.com.tw  
Sent: Monday, August 04, 2003 1:25 AM  
To: mkuo@ccsemc.com  
Cc: lucy\_tsai@ccsemc.com.tw; eric@ccsemc.com.tw; ting@ccsemc.com.tw  
Subject: Subject: FW: Universal Scientific Industrial Co., Ltd., FCC ID:IXMCF-B-AG-01, AN03T3118

Hi Mike,

Please find below for the answers for Q#1,-6,and 7.

Q#1, please refer to the attached for the equipment spec for details.  
Q#2, the upper frequency for spurious emission test is to 24GHz, and because the reading of emissions are attenuated more than 20dB below the permissible limits or the field strength is too small to be measured, so they hadn't been recorded on the test report.  
Q#3, through checking and explain to USI, that now they can accept just do the product approval instead of modular approval, so please take off the modular request letter.  
Q#4, CF card can be taken as ITE accessory device and that's why FCC DOC logo is added. Also, attached please find a FCC Doc test report for reference.  
Q#5, the maintain distance and the modular installation have been deleted and please refer to the attached for the revised user manual.  
Q#6, please find the attached for the statement issued by USI, stating that this CF card can only be operated at the Ch. 1-11.  
Q#7, please refer to the attached for the revised confidential letter.

Thank you and Best Regards,

Jonson

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

From: "Mike Kuo" <MKUO@CCSEMC.com>  
To: "Jonson Lee (E-mail)" <jonson@cclab.com.tw>; "Eric (E-mail)" <eric@cclab.com.tw>; "Lucy (E-mail)" <lucy\_tsai@cclab.com.tw>; "Ting (E-mail)" <ting@cclab.com.tw>  
Sent: Tuesday, July 29, 2003 5:53 AM  
Subject: FW: Universal Scientific Industrial Co., Ltd., FCC ID:IXMCF-B-AG-01, AN03T3118

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

From: CERTADM  
Sent: Monday, July 28, 2003 2:49 PM  
To: 'mkuo@ccsemc.com'  
Subject: Universal Scientific Industrial Co., Ltd., FCC ID:IXMCF-B-AG-01, AN03T3118

Notice\_content

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15.247 portion :

Question #1: The peak output power measurement was made with Narda detector.

Based upon FCC recent instruction on the peak output measurement for WLAN device. Such instruction is given below:

#### Output Power Measurements

For all output power measurements using power meters, please assure that the probe video bandwidth is greater than the signal bandwidth. Otherwise measurement errors can result. We have noticed many instances, especially for DTS devices, where the output power measurement probe appeared to have a smaller video bandwidth than the signal bandwidth. When output power probes with sufficient bandwidth are not available to measure a particular signal than the alternate techniques, discussed in Joe Dichoso's "Unlicensed" TCB training material from May 2003, should be used. These techniques include spectrum analyzer channel power functions and power/bandwidth extrapolation. UNII devices have alternate procedures defined in Public Notice DA 02-2138. Remember for all power measurements please use the correct measurement detector peak or average corresponding to the appropriate limit.

Please provide the specification of Narda Detector with the information to justify that such detector complied with FCC instruction. Otherwise, please provide output measurement to comply with FCC instruction.

Question #2: What is the upper frequency investigated for radiated spurious emission tests above 1 GHz ?

Question #3: The device submitted in this application is compact flash card with integral antenna with standard interface allows user to plug in this device in a typical notebook computer with CF interface. CF card with integral antenna is considered as finished product and it is not considered as module transmitter. This application will not be reviewed as transmitter module approval. Please confirm.

#### Administrative review portion:

Question #4: The proposed FCC ID label contains FCC DoC logo which indicates this device is also complied with FCC DoC procedure. Please justify why this CF card is under the scope of FCC DoC procedure by referencing section 15.3(r ) of FCC rules.

Question #5: There are two RF exposure statement provided in the user manual. One of RF exposure statement requires the end user to maintain 2.5cm separation distance and the other RF statement does not have such requirements. Please explain the intends for two RF exposure statements in the user manual.

Question #6: Based upon the operational description, this CF card is capable of transmitting with 13 channels (EU) and 14 channels ( Japan ). Based upon recent FCC instructions, when the device is capable of transmitting beyond authorized frequency channel, the following information has to be confirmed by the manufacturer:

#### User Selectable Frequencies by Country

At this time, the FCC will not authorize transmitters that have the capability to allow the end user to choose various frequency bands that may be valid for other countries but are not in accordance with the frequency bands permitted by the FCC rules for use in the USA. This includes transmitters that use active or passive listening techniques on these

non-USA frequencies. These transmitters must have these end user options disabled.

Section 15.15(b) prohibits adjustments of any control by the user that will cause operation of a device in violation of the regulations. Accordingly, any proposal to allow the end user to choose extended channels on frequencies outside of an allowable frequency band in the USA is not acceptable. For example, a WLAN device operating according to Section 15.247 on channels 1-11 between 2.4 - 2.483.5 GHz must not have any user controls or software to allow the device to operate on channels 12 and 13 which are outside of the allowed USA band. This issue may be addressed in a future rulemaking.

Based upon above instructions from FCC, please confirm in writing that this CF card will not have any user selectable function to enable this device operates beyond 2412-2462MHz.

Question #7: Two items ( schematic and block diagram ) are listed in the request for confidential letter. The operational description contains block diagram but such document is not in the requested letter. Please make necessary correction on the request for confidentiality letter.

SAR Portion :

No question.

For Your Information:

The possible grant condition will be listed as :

Output power is conducted. Device has been tested for SAR compliance in specified notebook computer with rear card slot, as described in this filing, and can be used in notebook computers with substantially similar physical dimensions, construction, and electrical and RF characteristics. The antenna(s) used for this transmitter must not be co-located or operating in conjunction with any other antenna or transmitter within a host device. End-users must be provided with specific information required to satisfy RF exposure compliance for final host devices. The maximum reported SAR value is: body 0.124 W/kg.

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 60 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.