To: Diane Poole, Diane.Poole@fcc.gov
FCC Equipment Authorization Branch

From: Keijiro Kumagai, UL Apex Co., Ltd.
Keijiro.Kumagai@jp.ul.com

SUBJECT: Reply to comments for following submission
Applicant: Fujitsu Limited
FCC ID: EJE-WL0009
Correspondence Reference Number: 29260
731 Confirmation Number: EA280384
Date of Original E-Mail: 7/25/2005

1) User manual mentions "Optional Bluetooth" - please explain authorization status, and/or submit separate FCC ID label info if that is modular approved. If this filing is intended to certify Bluetooth, then Bluetooth must always be installed under this FCC ID.
Answer: There is no "Optional Bluetooth" for "FCC ID: EJE-WL0009". There are different model including Bluetooth feature. However, we will obtain separate FCC ID for the model including Bluetooth module. So there is no "Optional Bluetooth" for "FCC ID: EJE-WL0009". We revised whole manual to comply with your request. Please find "Revised Users Manual 1"&"Revised Users Manual 2"and replace with already submitted one. Applicable page for your comment is page 9 of 52(labeled 71) of attached "Revised Users Manual 2". We deleted statement about "Optional Bluetooth".

2) Please show Bluetooth antenna location and describe if/how SAR results in this filing are applicable for simultaneous transmission if that mode is possible, or revise filing if appropriate.
Answer: There is no "Optional Bluetooth" for "FCC ID: EJE-WL0009". So we do not need to perform above-mentioned testing.

3) need user manual instruction that 5.15-5.25 GHz for indoor use only
Answer: Please see page 23 of 52(labeled 85) of attached "Revised Users Manual 2".

4) Please explain purpose for "Separation change" SAR test positions, and why done for 5-6GHz only but not 2.4GHz.
Answer: We tested only the zero distance (touch position) from the data of SAR value vs. distance by the standard dipole antenna and from our many experience. We have attached data"2.4 GHz SAR data for Separation change.pdf" by the standard dipole antenna for quantitative back data of 2.4GHz. We have conducted SAR Tests for various 2.4GHz 802.11b/g Notebook Computers assembled with the equivalent antenna in the past.
However, we do not have much experience for 5GHz with this point. So this is why we've done "Separation change" SAR test only for 5-6GHz just in case.

fyi SAR positions:
1) 2 edges direct-contact 2.4ghz-only
FYR: See above answer to your comment 4)
2) 2 edges 0,5,10mm gap 5-6ghz
FYR: See above answer to your comment 4)
3) lapheld
FYR: Since this device is laptop computer, with consideration for actual use of this device, we tested lapheld(Bottom) Position with ZERO distance(Touch Position).

4) lid-open 1.5cm from back of display top

FYR: Please see page 11 of SAR Test Report "25FE0221-HO-3" and "25FE0221-HO-4". Page 11 of the SAR reports state as follows;

["Front" and "Side" positions are assumed when users operate in the tablet type use. When users operate or carry this EUT, it is can be touched to the user's Body. Therefore, "Front" and "Side" positions were tested in the touch to the phantom. However, "Back" position is assumed when users operate in the note type use. Therefore "Back" position was tested in the distance15mm from the phantom.]

fyi usr man has:
"2.4GHz-band : 0.216[W/kg],
5.25GHz-band : 1.05[W/kg],
5.8GHz-band : 0.546[W/kg]"