Intel Corporation
2300 Corporate Center Drive
Thousand Oaks, CA 91320

Date: 04/24/03

American Telecommunications Certification Body, Inc.
6731 Whittier Avenue
Suite C110
McLean, VA 22101

To Whom It May Concern:

This letter is to attest that during SAR measurements taken on 31 March 2003 with the Intel Pro/Wireless 2100 WLAN Mini-PCI Type 3B Adapter by Aprel Laboratories the Intel model number WM3B2100 was not in saturation at the output power of 17.8dBm with 100% duty cycle. This higher output power level was used for the most conservative SAR.

This device will only be manufactured and shipped with the maximum output power or less of what is listed on the FCC Grant and listed in the EMC FCC Part 15 Subpart C test report issued by Aegis Labs. This output power setting is flashed into the EEPROM during calibration, this is not accessible and can not be changed by the end user.

Thank you for your attention to this matter.

If you have any further questions or need additional information, please feel free to give me a call at 805-376-9300.

Sincerely,

Robert Paxman
Compliance Engineer
Wireless Network Division
Intel Corporation

4/24/03
Date

-----Original Message-----
From: S.Nicol@Aprel.com [mailto:S.Nicol@Aprel.com]
Sent: Tuesday, April 08, 2003 2:06 PM
To: Robert.Paxman@intel.com
Cc: mperrine@fcc.gov; Jim.Baer@intel.com
Subject: DELL E2K24CLNS (3984)

Dear Robert,

Concerning the issue with the above named FCC-ID I have subsequently spoken
with Mr. Martin Perrine from the FCC and asked his advice concerning the
response from Mr. Dennis Ward (ATCB) requesting that the above named project
be reassessed.

My understanding is that the EMC lab assessed this unit with a conducted
power of 16.8 dB.

As per your request, and to have a more conservative approach to SAR
assessment, we assessed the unit at a conducted power level of 17.8 dB.

I have explained to Martin Perrine at the FCC that the Mini PCI card as
tested has a rather large range in respect to power, and that when we
assessed the unit at 17.8 dB for SAR we were not saturating the amplifier.

I have explained to Martin, Intel's approach to assessing SAR, and that your
organization would rather adopt a more conservative approach, when assessing
for SAR.

During my conversation with Martin, he advised me that it would not be
necessary for us to reassess the above names device, as long as Intel attest
to the fact that the amplifier was not saturating during the SAR assessment
at 17.8 dB. I would ask that you provide Dennis Ward, an attestation

statement to this effect and provide him further explanation to Intel's
approach to assessing SAR.

Martin did point out that the conducted value of 16.8 dB measured by the EMC
lab will remain on the grant, and that if in the future Intel decide to
release this card, at the same conducted power of 17.8 dB at which SAR was
assessed a new grant would have to be applied for.

I hope that I have been of assistance to you in this matter.

Regards,
Stuart Nicol.

>From: "William Graff" <whgraff@americanTCB.com>
>To: "'Dennis Ward'" <dward@americanTCB.com>
>Cc: <reviewers@atcb.com>
>Subject: Conversation with FCC re: SAR power
>Date: Wed, 9 Apr 2003 14:24:15 -0700
>X-Mailer: Microsoft Outlook, Build 10.0.3416
>Importance: Normal
>
>Dennis,
>
>I had an interesting talk with Martin Perrine of FCC today. It ap
pears
>the Commission is satisfied with the idea that a SAR report can s
how an
>RF power output substantially (greater than 5%) higher than the E
MC
>report provided a satisfactory rationale is provided. It is recom
mended
>that an attestation be provided to show the power listed in the E
MC
>report is correct for purposes of listing on the Grant, and that
no
>product using the power listed in the SAR report will be produced
.
>
>Cheers!
>
>Bill
>
>~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~
>~ William H. Graff, NARTE Certified
>~ President and Director of Engineering
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>~ McLean, VA 22101
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>~
>~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

Timothy R. Johnson, NARTE Certified EMC Engineer (No. EMC-002205-N
E)
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