

18 December 2001

Mr. Richard Fabina
Chief, Equipment Authorization Branch
Office of Engineering and Technology
Federal Communications Commission
7435 Oakland Mills Road
Columbia, Maryland 21046

In re: Apple Airport Base Station re-authorization
FCC ID No. IMRWLPC24H

Dear Richard:

Apple Computer, Inc., submits this filing to request a Class II permissive change for the Apple Airport Base Station ("Airport") referenced above. Specifically, Apple requests that the FCC laboratory evaluate the attached filing and, upon approval, reissue the current Airport Grant of Equipment Authorization ("Authorization") with the existing FCC ID, but without the existing 20 cm separation and antenna co-location/operation conditions.¹

To support this request, Apple is including within this filing specific absorption rate (SAR) test data and a SAR report for the Airport. The SAR data and report demonstrate that the Airport device measures far below the SAR limits for "General Population/Uncontrolled exposure" in Section 2.1093 (d) (2) of the Commission's rules. Consequently, the 20 cm minimum separation distance and co-location/operation conditions of the current authorization are unnecessary.

To further support Apple's request, we note that the prior grants of authorization for the Agere radio LAN card (same FCC ID number) used in the Airport did not require antenna separation and co-location/operation conditions normally associated with a mobile device. As a result, if it is determined that the SAR test data and report are

¹ See *Grant of Equipment Authorization*, issued November 12, 2001 by Compliance Certification Services.

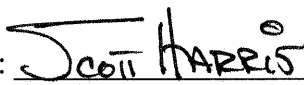
Mr. Richard Fabina
18 December 2001
Page 2

satisfactory, re-issuing a Grant of Equipment Authorization without the antenna separation and co-location conditions would not require a new FCC ID number.

In addition to the newly generated SAR test data and report, Apple is including all of the material filed to support of the November 12, 2001 Grant of Equipment Authorization. Please note that there are no physical changes to the device as tested for the November 12, 2001 authorization. The November 12th material is included simply for your staff's convenience. Thank you for your consideration and assistance.

Respectfully submitted,

Apple Computer, Inc.

By: 
Scott Blake Harris
Damon C. Ladson

HARRIS, WILTSHIRE & GRANNIS, LLP
1200 Eighteenth Street, N.W.
Suite 1200
Washington, D.C. 20036
(202) 730-1300