

In response to the question received from the FCC please submit the following information.

5. This filing does not appear to presently contain appropriate info to support grantee responsibility for FCC RF exposure compliance. For tablet PCs (both slate and convertible types) which have 0 & 180 deg. landscape and portrait screen-orientation modes, edge of device near or in contact with the user's body is expected to be a normal use position. SAR evaluation is needed for edge(s) of product which contain antennas in contact with phantom (display face normal to phantom), unless transmitting is disabled for those certain display orientations.

5a. Filing is presently unclear about exact positions tested for SAR, e.g., summary pages in SAR report section 6.5 list DUT position as "Front." Please provide separate exhibit containing only a list of all final-product SAR test positions, and test setup photos showing product placed at phantom.

5b. Please address FCC RF exposure compliance for tablet edge positions that place transmit antenna(s) in contact with phantom, or provide Operational Description info if final-product prevents transmission in those positions.

As per the guidance from the FCC for previous filings we have tried to submit data which is only relevant to the worst case position and location for the SAR. Although the report does not contain all the data for the measurements executed we can confirm that all edges of the device were assessed. Section 1.2 provides information with respect to the process executed by APREL Laboratories and indicates that it is only the worst case data which is contained in the report.

1.2 Device Description

*The Device Under Test (DUT) is a tablet PC which uses a PCI-Express WLAN card set to transmit in tablet PC mode and standard laptop use. The cards RF output port was connected to an internal antenna with the DUT set to transmit at the maximum average power as defined by the manufacturer. A full and complete area scan was ran over the whole area of the device to establish the location for the maximum SAR for both tablet and normal use conditions. The location for both operating conditions was then assessed and the maximum average SAR is reported. The card was operated utilizing proprietary software and each channel was measured for average RF power using a broadband power meter to ensure the correct RF power values are used for assessment. The tests conducted reflect normal use conditions which represent a **WORST CASE** user exposure condition when the DUT is used in conjunction with the antenna listed. The device was tested with a 5mm separation representative of a user operating the system with clothing on.*

Continuing on from here section 6.5 pages 20 through 25 show the position and location for the DUT in the worst case position for all tests executed. The location for the maximum SAR for both tablet mode and while the LCD was closed was found on the bottom right of the DUT.

Section 6.6 page 25 contains the following statement with regards the SAR measured for the other locations.

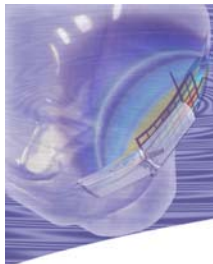
6.6 Additional Information

The Intel® PRO/Wireless WM3945ABG Network Connection along with the antennas was tested in other positions with respect to general user scenarios, where the SAR was found to be less than 80% lower than the highest value recorded. The following images represent the full exposure conditions in which the DUT was assessed.

It is clear that all appropriate sides and edges have been assessed, and that particular attention was paid to the locations where both the receive and transmit antennas were located.

Positions Tested during the assessment included,

- 1) Front of the DUT with LCD Closed
- 2) Front of the DUT with the LCD open in tablet mode
- 3) Underside of DUT tablet mode
- 4) Underside of DUT normal mode
- 5) Left Hand Side of the DUT tablet mode
- 6) Right Hand Side of DUT tablet mode
- 7) Left Hand Side of the DUT normal mode
- 8) Right Hand Side of DUT normal mode
- 9) Front Edge DUT tablet mode
- 10) Front Edge DUT normal mode
- 11) Back Side DUT tablet mode
- 12) Back Side DUT normal mode



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Left Hand Edge

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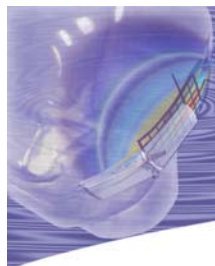
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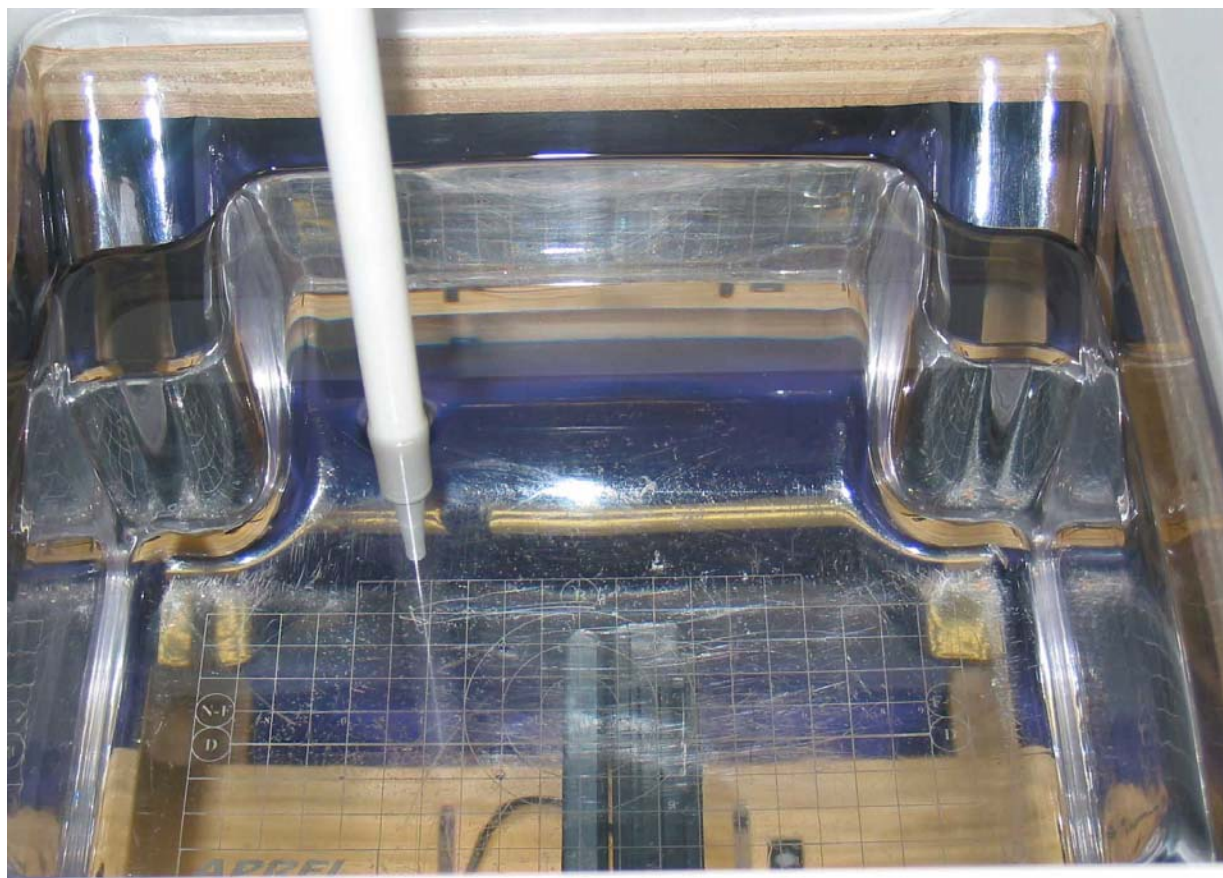
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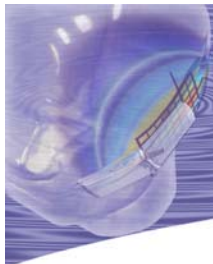
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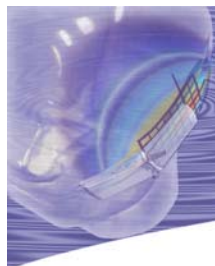
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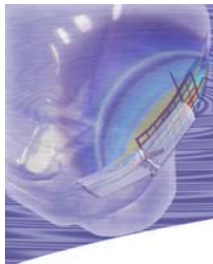
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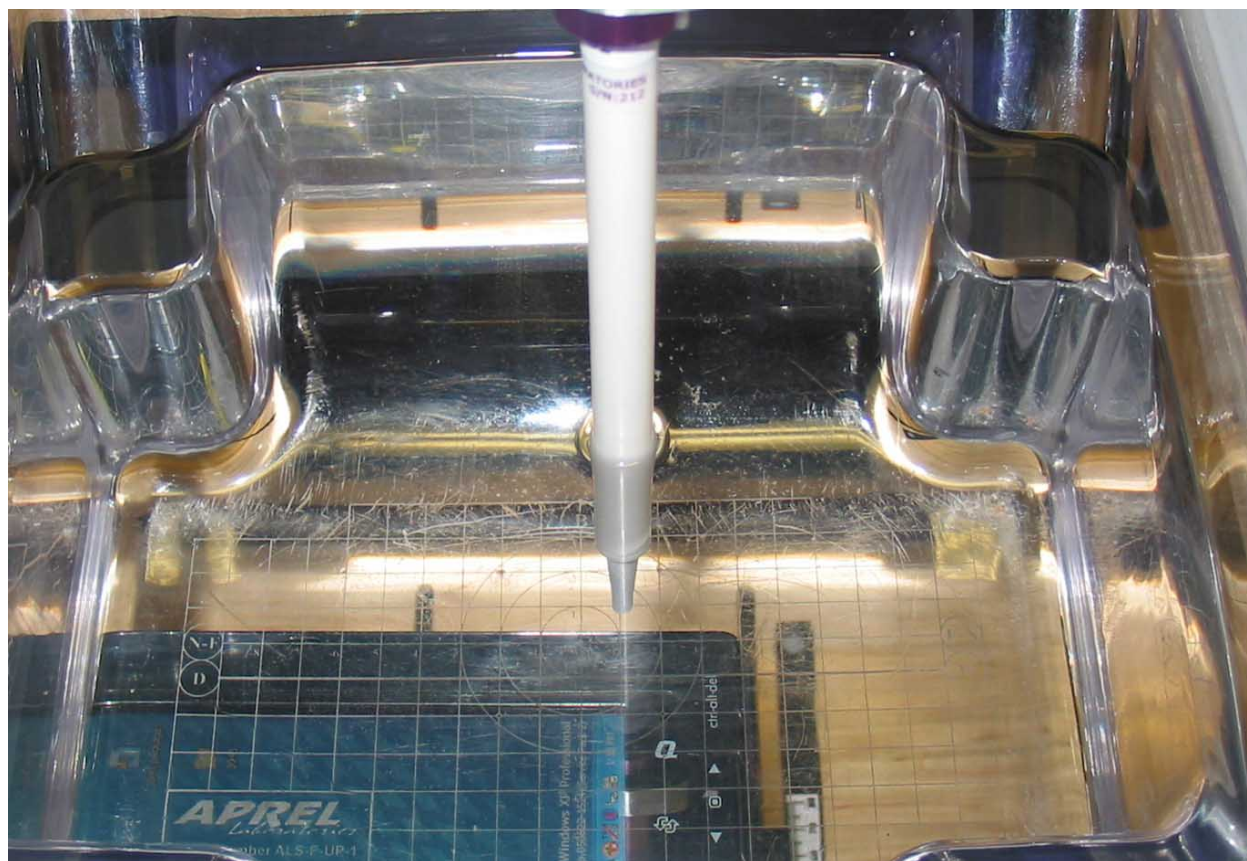
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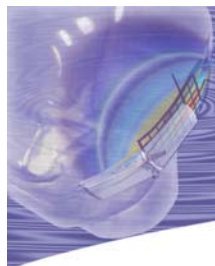
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