

Mike Kuo

From: Generic Office of Engineering Technology [oetech@fccsun27w.fcc.gov]
Sent: Friday, October 13, 2006 2:11 PM
To: Mike Kuo
Subject: Response to Inquiry to FCC (Tracking Number 302249)

Inquiry:

co-located transmitter with < 30 seconds handover time between the networks

Dear FCC :

Based upon Oct. 2006 revised TCB exclusion list as detailed below:



{5)e) amd2}2 TCBs may process multi-transmitter final products with highest output transmitter (dominant) subject to SAR routine evaluation, and other (non-dominant) transmitter with $P > 5$ mW, for conditions:

- Co-transmission has relatively short duration (< 30 seconds), serving as handover (handoff) between two networks

- Filing must include details about maximum handover time, and how handover co-transmission time is restricted

The device is a tablet PC with 802.11 a/b/g WLAN, Part 22/24 WWAN module and Bluetooth Module. The locations of each TX is illustrated in the attachment.

Question #1 Attached please find the theory of implementing network switch which will only allow simultaneously transmission for less than 11 seconds. I would like to request FCC to verify such software switch is acceptable based upon guideline given by FCC and qualify for TCB review.

Question #2: Please confirm that even the network switch time is less 11 seconds, co-located SAR evaluation with dominant TX (Part 22/24 WWAN) and non-dominant TX (WLAN) is still required . (Test software provided by manufacturers can enable dominant TX and non-dominant TX together for duration of SAR evaluation).

Question #3: Please confirm that if co-located SAR evaluation is required, evaluation should only be performed with WWAN and WLAN co-located condition. WWAN and Bluetooth or WLAN and Bluetooth co-located SAR evaluation are not required.

Question #4: If co-located SAR evaluation is not required, please advise what is the best way to indicate such co-located transmitters condition in the grant condition.

For your information, Bluetooth output power is about 1 mW.

Best Regards

Mike Kuo / CCS

Response:

10/31/2006

Answer #1: per Jul06/Oct06 FCC-TCBC handover co-transmission guidance, co-transmission SAR evaluation is presently not requested for product operating per attached description, and therefore TCB processing is allowed

Answer #2: co-transmission SAR evaluation is presently not requested for product operating per attached description

Answer #3: see Answer #2

Answer #4: applications contain co-transmitting SAR evaluation data per described scheme must file at FCC not TCB

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