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.Subject: FCCID :KBCIX600-IWL Response to ATCB questions.

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Dear Tim,

Here are our answers to per your commentts

1) Please note that the IC Listing letter mentions Nemko and not ATCB. Please correct this on future applications.

Response: This will be corrected on future applications.

2) Page 11 of the users manual shows additional antennas for GPS and CRMA Express. Page 10 mentions Bluetooth. While the GPS is a RX only device, the Bluetooth and CRMA Express are TX's and do not appear to be covered by this application. Please note that as presented this application will be granted for the WLAN device only and also with limitations of no-colocation. To remove these restrictions at a later time will require the CRMA Express or bluetooth to be approved under their own FCC ID as a limited modular approval specific to this device only and also a Permissive Change application would be required to this application covering the co-location RF exposure concerns and any other necessary items for the Permissive Change, or alternatively the device must be approved with a different FCC ID Number. Please explain as we want to be certain this device is being approved as expected by the manufacturer.

Response: The product will have GPS, CRMA WAN , Bluetooth PAN and WLAN in product definition. The GPS, CRMA and Bluetooth will be optional according to end user requirements. We wish not remove them from user manual. It is understood the product will have a different FCC ID for different configurations. In this application, the FCC ID will be for the WLAN configuration only. Please see attached (Radio Specific Safety-02.pdf) document to be packaged with each computer.

3) Page 100 of the users manual mentions a WLAN, WAN, and PAN radio. Please explain as 2 of these do not appear to be covered by this application.

Response: It is understood the product will have a different FCC ID for different configurations. In this application, the FCC ID will be for the WLAN configuration only. Please see attached (Radio Specific Safety-02.pdf) document to be packaged with each computer.

4) Section 15.15(b) prohibits adjustments of any control by the user that will cause operation of a device in violation of the regulations. Accordingly, any proposal to allow the end user to choose extended channels on frequencies outside of an allowable frequency band in the USA is not

acceptable. For example, a WLAN device operating according to Section 15.247 on channels 1-11 between 2.4 - 2.483.5 GHz must not have any user controls or software to allow the device to operate on channels 12 and 13 which are outside of the allowed USA band. For instance, the user should not be able to select alternative countries which would allow different channel plans outside of the allowed USA band. Please explain how this device is compliant to this requirement for all 802.11 bands of operation.

Response: The WLAN device to be sold in the USA is controlled by software built into the device as to allow only US Bands to be used. See attached exhibit. (US only frequency attestation.pdf)

5) The modular functional description (page 12 of 13) appears to mention that this device has 200 mW and 1000 mW levels for 801.11A and 100 mW levels for 802.11 b/g. These levels do not appear to correlate to those measured. Please explain and correct as necessary.

Response: Intel has provided an updated functional description as uploaded.

6) Please provide information to explain compliance to 15.407(c).

Response: This filing is using a Pre approved WLAN Radio FCCID: PD9WM3B2915ABG. Compliance to 15.407(c) is controlled by the firmware of this device.

7) The users manual does not appear to explain that the 5150-5250 MHz band is for indoor operation only. This information was found in the Manufacturer manual for the card, but this manual does not appear to be intended for the end user. Please update the users manual.

Response: Please see attached (Radio Specific Safety-02.pdf).

8) The test report suggests that this device contains Bluetooth as well, but this does not appear to be covered by this application. Please explain.

Response: It is understood the product will have a different FCC ID for different configurations. In this application, the FCC ID will be for the WLAN configuration only. I have deleted the wording. Please see the updated report

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9) Page 29 shows limits of 80 and 90 dBuV ERP. Normally these limits are -17 dBm EIRP or -27 dBm EIRP and are adjusted by the antenna gain. Therefore, $-17 \text{ dBm} - 2.26 \text{ dBi} = -19.3 \text{ dBm EIRP}$ (87.7 dBuV), and $-27 \text{ dBm} - 2.26 \text{ dBi} = -29.3 \text{ dBm EIRP}$ (77.7 dBuV). Please correct data as necessary.

Response: Antenna gain has been added to calculate corrected emissions.
Corrected Emissions=Spectrum + Corrected Factor, Corrected Factor=Cable Loss+Antenna Peak Gain (dBi)
corrected to dBuV EIRP. Please see the updated report.

10) Section 4.8.4 shows a data point that appears out of compliance. Please review and correct.

Response: It has been corrected. Please see the updated report .