



American Telecommunications Certification Body Inc.  
6731 Whittier Ave, McLean, VA 22101

September 30, 2003

RE: FCC ID: E2K24CLNS

Attention: Rick Candelas

I have a few comments on this Application.

1. What is the purpose of this PC2? Please provide a letter stating the purpose of the PC2 (i.e. to add antennae etc).
2. Please note that there is conflicting documentation concerning the installation of this device. Please also note that the grant is not a modular but a Limited Modular approval for use in a specific host. The original and subsequent PC2 grants state that the WLAN AND ANTENNA(S) MUST BE INSTALLED BY THE OEM / INTEGRATOR. The Intel OEM installation states that only OEM integrators can install the mini-PCI card. The manual now indicates on page 23 that the user can install the mini-PCI card. This violates the grant condition. The manual needs to be changed to agree with the grant (i.e. the WLAN can only be installed by the OEM or OEM/integrator).
3. Please note that the original report stated that the PC in which the WLAN was installed was the PP05L. This report states the PC is the PP10L. The host tested does not appear to be the same host model that this LMA applies to. Please explain (i.e. what are the differences between the granted PP05L and this PP10L host?).
4. Please verify that the appropriate labels for the Bluetooth device are still on the host.
5. Please note that the readings of the band edges on pages 24 and 31 only show the corrected readings. Please explain and/or show the measured reading and correction factors in the table.
6. FYI - no action needed. Please note that the SAR reports contain 'Direct contact' (sometimes referred to as hands wrist feet etc) SAR. Please note that this information cannot be reviewed by a TCB and is in fact superfluous and unneeded information for the purpose of this grant. The FCC does not require this information and is best not provided when a TCB is certifying a device. Consequently all such information will be ignored by ATCB during this review. Neither will this information be provided on the grant.
7. Please note that TCBs must use 1528 and OET 65C. The SAR report states that 1528 section 7 was used "where applicable". Please explain, if any, the parts of section 7 of IEEE1528 that were not 'applicable'.
8. Please note that the conducted power measurements listed in the EMC report show a max of 16.75dBm. The conducted power listed in the SAR report show a max of 16.5dBm power. Please note that, when different, the SAR power must be the higher of the two (i.e. SAR is measured at the highest output power of the device). Please also note that the FCC, in accordance with the OET SAR review checklist, requires conducted power to be within 5% between the EMC and SAR report). This is different than the 5% power drift requirement during SAR measurements. Please explain why the SAR was not measured at the required higher power. Please provide data whereby SAR is the higher power measured for conducted power (the variance between existing SAR and EMC reports is 6% and while not exceeding by much, it is over the allowed percentage. Please make sure that the EMC and SAR report power is within 5% for conducted power (5%=approx .23dB). Alternately, please provide a reasonable justification for the use of the lower power during SAR testing.
9. Please note that the SAR report states that the same power level existed at all three frequencies tested (2412, 2437 and 2462MHz). The power measured at these frequencies in the EMC report varied by up to .8dBm. It would be expected that power would also vary by similar values for SAR power measurement. It would also be expected that the power would drift some between the before and after power measurements over the 12 to 16 hours of testing done. The data table in section 6.1 of the SAR report states that there was no power drift between the before and after in this 12 to 16 hour time frame and that the same power was measured at all three frequencies (16.5dBm). Please explain.
10. Please note that in the document "Test Report - SAR with Yageo-Phicomp Antennas Part 2 of 5.pdf", a number of values have been replaced with the Question mark (?). While it may be

assumed what these values and terms are, the report should properly indicate these values. Please correct the aforementioned document (see pages 2, 5, 6, 7 and 8). Also see "Test Report - SAR with Yageo-Phicomp Antennas Part 3 of 5.pdf" for similar errors.



Dennis Ward

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.