

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

July 21, 2003

RE: Dell Computer Corporation

FCC ID: E2K24CLNS

After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) It is not certain if SAR values are given in the users manual (since this was not supplied), which may need to be changed or modified for the results of this application. Please provide a copy of the users manual.
- 2) Please provide a description of the holder or similar fixtures used to position the test device in the specified test configurations.
- 3) The FCC asks that the composition, ingredients, and amounts for tissue liquid be listed in the report. Section 5.4 does not provide this information. Please provide.
- 4) It appears that the 1 G SAR validation was performed in muscle tissue, while the dipole calibration appears to have been done in head tissue. However the 1 Gram SAR target appears the same given different tissues. Please explain provide information regarding the derivation of the muscle target values used.
- 5) From information given in the test reports, the following could not be determined:
 - a) if the distance between the <u>measurement point (tip to boundary distance + offset)</u> at the probe sensor location (geometric center behind the probe tip) and the phantom surface is < 8.0 mm and maintained at a constant distance of +/- 1.0 mm during an area scan to determine peak SAR locations. Please comment.</p>
 - b) If probe boundary effect compensation is not used the <u>probe tip</u> should be positioned at least half a probe tip diameter from the phantom surface during area and zoom scans. Please comment.
 - c) The first 2 measurements points in a zoom scan closest to the phantom surface, should be within 1 cm of the surface. Please comment.
- 6) The FCC asks that all configurations within 3 dB of the limit be tested at low, middle, and high channels. It does not appear that low, middle, and high channels were tested for the LCD open configuration.
- 7) FYI.....For future applications it would be recommended to included references to §2.1093 and also a statement as to whether the device is being tested to Occupational/Controlled OR General Population/Uncontrolled limits? Note that although limits were specified, it does not appear that they were defined as to which category the device was being subjected to.

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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.