

To: Anne Liang; TCB CERTIFIERS
Cc: CLIENT ADVOCATES; Thu Chan
Subject: RE: Broadcom Corporation, FCC ID:QDS-BRCM1008, AN03T3227

Note from TCB to correct Question #1:

I issued this Question to the test lab based upon the duty cycle measurement requirements per section 15.35c of FCC rules. This question has been challenged by the test lab. After I reviewed the FCC public notice DA 00-705, the duty cycle correction is unique for frequency hopping device. Based upon the frequency hopping transmitter " must be used equally on the average by the transmitter " , the duty cycle correction shall be followed $20\log(\text{dwell time}/100\text{ms})$. Formulas stated in 15.35c does not apply to frequency hopping device.

Based upon finding, I informed the test lab question #1 shall not be addressed. Test data presented in the test report is corrected.

M.Kuo

-----Original Message-----

From: Anne Liang
Sent: Monday, September 08, 2003 3:30 PM
To: TCB CERTIFIERS
Cc: CLIENT ADVOCATES; Thu Chan
Subject: RE: Broadcom Corporation, FCC ID:QDS-BRCM1008, AN03T3227

Hi Mike,

Attached please find revised manual per your instruction.

Thanks,

Anne

-----Original Message-----

From: CERTADM
Sent: Friday, September 05, 2003 12:35 PM
To: 'mkuo@ccsemc.com'
Subject: Broadcom Corporation, FCC ID:QDS-BRCM1008, AN03T3227

Notice_content

Question #1: Page 57 of test report contains information about duty cycle measurement. The formula used to calculate duty cycle does not comply with FCC guideline. The basic formula (15.35C) is :

Duty cycle = on time/100 milliseconds or period, whichever is less

On time= $N1L1+N2L2+N3L3+...+N(n-1)L(n-1)+NnLn$

N1 is number of type 1 pulses, L1 is the length of type 1 pulses

Restating the basic formula

Duty cycle = $(N_1L_1+N_2L_2+N_3L_3+...+N(n-1)L(n-1)+N_nL_n)/100$ or T, whichever is less.
T is the period of pulse train.

The problem for Page 54 duty cycle measurement is lack of period of pulse train. Only if the pulse train is greater than 100mS can use 100mS. If the T is less than 100mS, you have to use the actual Pulse train measured to calculate duty cycle factor.

Question #2: In the future submission, please improve the image quality of Radiated emission data.

Question #3: RF exposure warning statement in page 4 of user manual requires 2.5cm separation distance to the body of user. Since this device is equipped with standard USB connector which can be used with typical notebook computer. When notebook computer is used, the separation distance will be less than 2.5cm. On the other hands, due to the output power is below the low threshold with less than 2.5cm separation distance, to require the end user to maintain certain distance to comply RF exposure is not required.

Please modify RF exposure statement by removing 2.5cm separation distance requirement and submitted revised user manual.

FYI: BOM is not required for Part 15C device, this document will not be submitted to the Commission.

Best Regards

Mike Kuo

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee. 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 e-mail address listed below the name of the sender.