



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

November 13, 2002

RE: BenQ Corporation

FCC ID: JVPAWL200

After a review of the submitted information, I have a few comments on the above referenced Application. These comments are all made upon the assumption that the EUT's full conducted output power is 29.6 mW and the antenna gain is **unknown (dBi)**.

- 1) The device is being submitted tested in a modular fashion, but a cover letter addressing the modular requirements has not been submitted. Please provide a cover letter which clearly address the modular issues given in the attached document.
- 2) The EUT appears to contain 2 antennas, each of a different length coax. Please comment on if both antennas may transmit, or may only one transmit. Please note that due to the short cable length of one antenna, there is a concern about how a device like this may be installed in equipment such as a laptop in order to obtain the 20 cm mobile requirements to the antenna. Modular approvals may only be performed on a mobile device. For this case it will be limited to OEM installation only. See attached slide from TCB training, case C.
- 3) Please provide information on how the ferrite cores will be attached to the cables. They should be shipped from the factory so that they are non-removable (i.e. heat shrinked, etc).
- 4) Please provide an exhibit for RF exposure.
- 5) The user manual should also include the information specified by 15.21.
- 6) Since this device is intended as a module and will be integrated by other manufacturers, the FCC logo is not required on the label since the device is not considered a PC peripheral device by itself. Please note that it is the integrators responsibility to retest any applicable digital device or PC peripheral device test requirements. Please correct the label.
- 7) The manual should provide further information and better detail as to a) how the OEM must use the module in order to maintain RF exposure compliance, b) information that they must supply in their manual, c) and that the modular transmitter approval is limited only to devices that can maintain the 20 cm distance between the antenna and body. In order to make sure that the integrators are given enough information, please see the provided separate attachment for suggested statements to be added to the users manual. Please provide a corrected users manual using these statements or similar.

Special Note: If an OEM integrator will place this device within a lapto, because a user may choose to use a laptop in their lap the antennas may only be positioned in the lid portion of a device in a fashion to ensure the 20 cm is met during use of the device. OEM integrators should be properly informed of these type of issues.

- 8) The test report states in section III that the device incorporates a permanently attached antenna on the PCB. This is not correct. Please correct the report appropriately. Please be sure to include information regarding its gain.
- 9) Note 2 on pages 26-28 also references a permanently attached antenna which is not correct. Please correct the test report.
- 10) Please comment on the RBW AND VBW settings used to provide the bandedge plots.

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Examining Engineer

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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.