



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

April 16, 2003

RE: FCC ID: E2K24CLNS

Attention: Rick Candelas

I have a few comments on this Application.

1. **FYI – no action needed.** Please note that the 731 for this device shows 47mW, yet the original grant is for 44 mW. Power cannot be changed using a PC2.
2. FYI – since this is a host specific application and the transmitter is not a stand alone module (i.e. the transmitter does not have its own ID number) it may not be proper to do this under a PC2 and it may need a new FCC ID number. I am checking on this with the FCC and will relay the answer to you as soon as possible.
3. Please note that while computer peripheral and other class B devices may be tested to CISPR limits, this intentional radiator spurious emissions must meet the limits of 15.247 and 15.209, not CISPR 22. **Please correct your report to reflect the proper limits for radiated spurious emissions. (See page 28 of the EMC report).**
4. Please note that the power levels between SAR and EMC reports cannot be greater than 5% (FCC OET Supplement C SAR evaluation checklist). The power reported in the SAR report is 17.8dBm (60mw) while the power in the EMC report is 16.75dBm (47mw). This is a 20% difference. Please remember that according to the FCC SAR checklist, when there is a less than 5% difference, the SAR report must be the higher. Please remember that each application MUST stand on its own merit and that assumptions cannot be made by a TCB. While the FCC may have given the SAR lab and/or the manufacturer verbal approval for this action to be taken, there is nothing in writing from the FCC attesting that this action is allowed. Please also remember that verbal statements made between manufacturers, labs and the FCC cannot be used by the TCB for approval processes. A TCB is limited in what it can and cannot do in this regard. **You have two options. You can retest the device for SAR or EMC or both using power levels within 5% in both the EMC and SAR report: alternately, you can provide written objective evidence from the FCC stating that such a large variation between SAR and EMC is allowed by the FCC.** Again, please remember that each application MUST stand on its own merit and that each application must contain the appropriate exhibits.
5. **FYI – no action needed.** Please note, as mentioned in the original application, SAR testing for hands, wrist, feet etc is superfluous and is neither needed nor desired for laptop computer configurations (see item 14d of the OET TCB SAR checklist). Also, please note that the FC has not released an appropriate test or evaluation procedure for this type test and as such does not allow TCBs to evaluate this type test. Also please remember that verbal communication, closed door committee meetings or other no published comments between the lab and the FCC has no validity at this time in the certification process as there is no objective evidence of such conversation. Since this test is not needed, since there are no procedures established by the FCC for this test and since no objective evidence exists from the FCC that a TCB can evaluate this type of SAR measurement, it will be ignored in the evaluation. The only SAR values to be listed on the grant will be those that the TCB is allowed to evaluate.
6. Graph 6 does not show the complete SAR area. **Please verify that there are no “hot spots” outside the area shown on graph 6.**

Dennis Ward

<mailto:dward@AmericanTCB.com>

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.