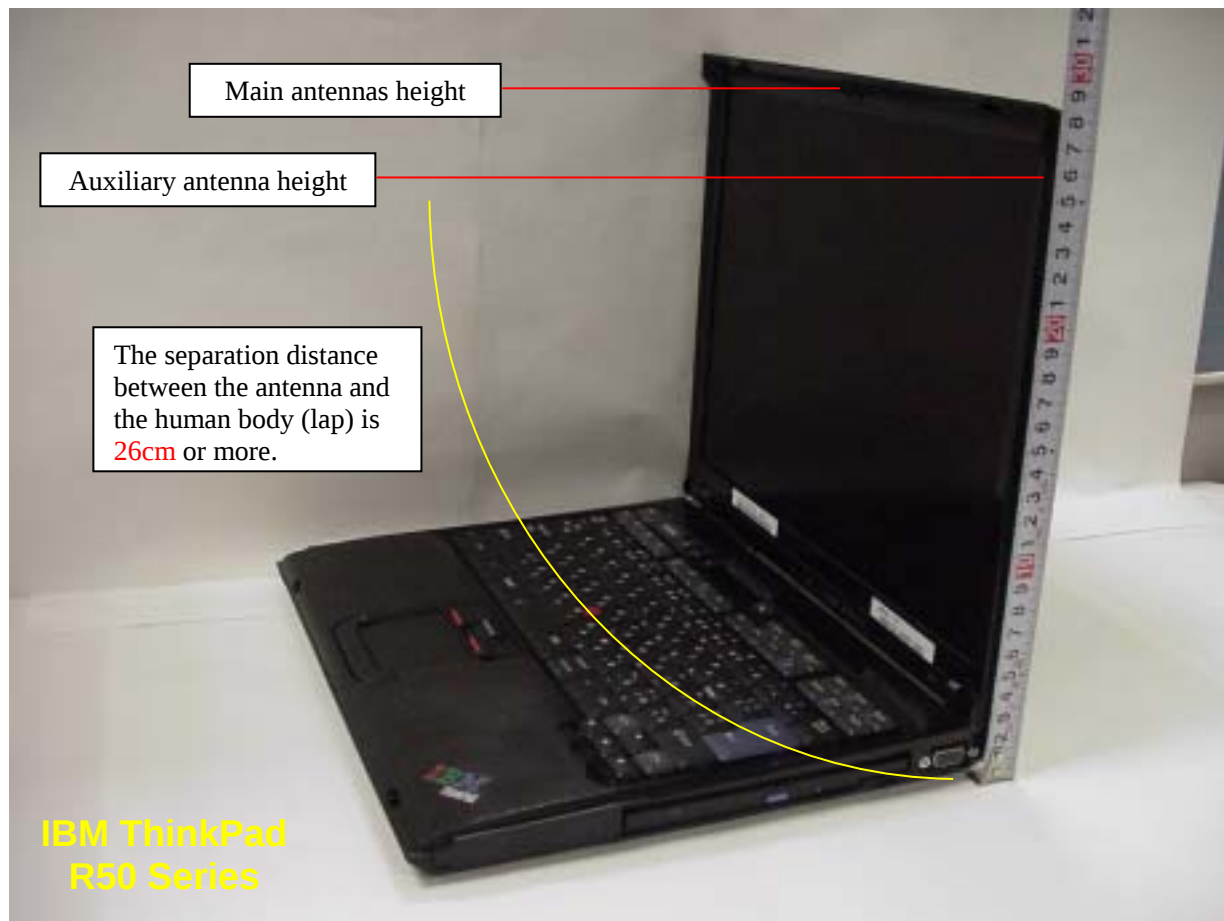


RF Exposure evaluation

1. RF Exposure evaluation for the applying LMA transmitter

As shown below, the main antenna is built in the top side of LCD and the auxiliary antenna is built in the right side of LCD. The separation distances between those antennas and the human body are 20cm or more.

Therefore the applying LMA transmitter and the antenna system is categorized as a mobile device by FCC CFR 47 Section 2.1091.



[MPE evaluation]

The following table shows the highest conducted peak output power of the applying modular device measured with the host device, and the maximum peak antenna gains of the host device.

Transmission mode	P : conducted peak output power	G : peak antenna gain
2.4GHz band DSSS	17.21 dBm (52.6 mW)	+ 1.84 dBi
2.4GHz band OFDM	17.06 dBm (50.8 mW)	+ 1.84 dBi
5.8GHz band OFDM	16.53 dBm (45.0 mW)	+ 1.78 dBi

With those results, the maximum power density at 20cm distance is calculated as follows.

Transmission mode	EIRP = P + G (dBm)	EIRP (mW)	Max. power density $S = \text{EIRP} / (4 \times 20^2 \times \pi)$
2.4GHz band DSSS	19.05	80.4	0.0160 mW/ cm ²
2.4GHz band OFDM	18.90	77.6	0.0155 mW/ cm ²
5.8GHz bnad OFDM	18.31	67.8	0.0135 mW/ cm ²

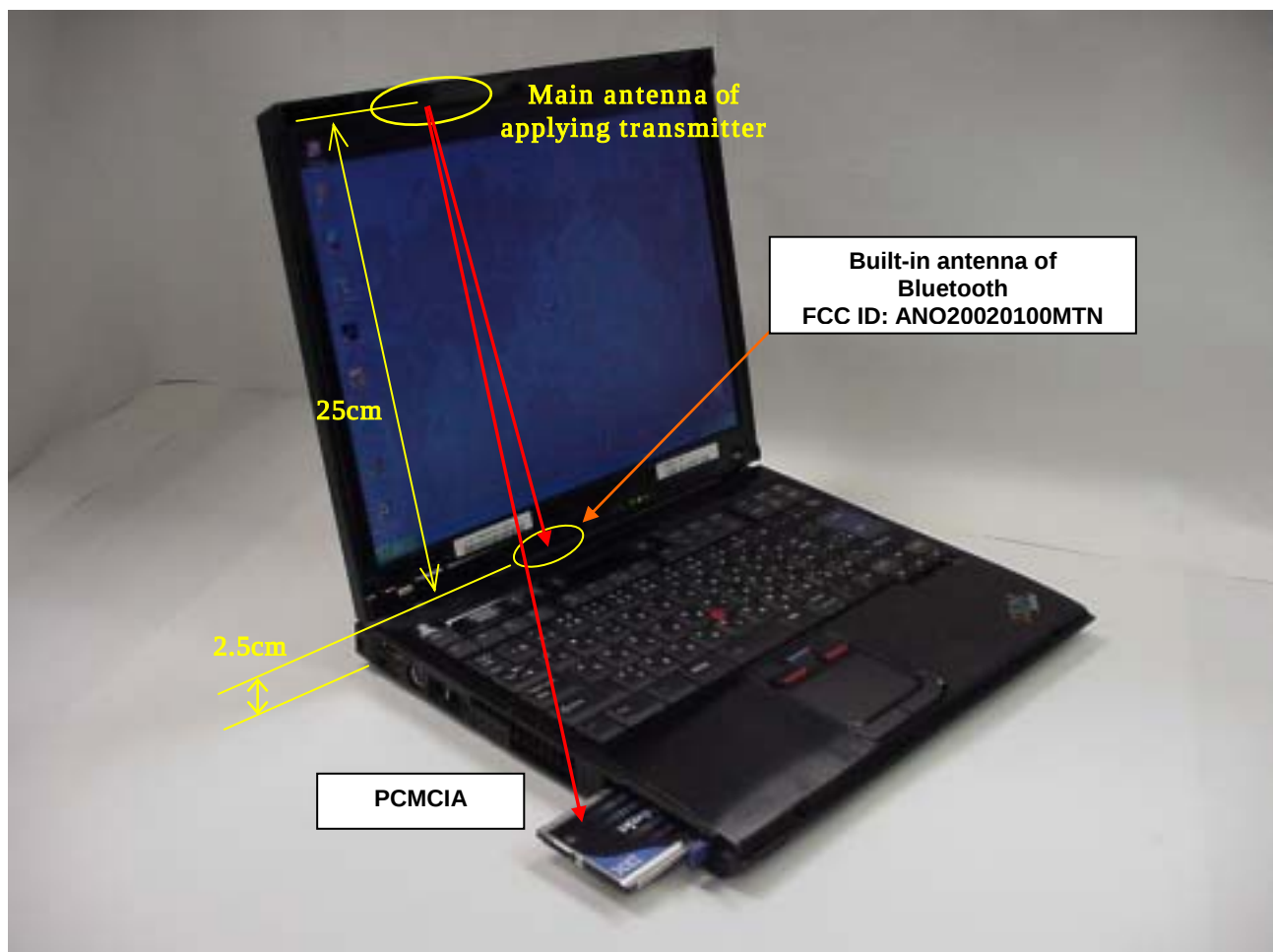
Since the applying modular transmitter device does not function to emit the radio frequency from both diversity antennas simultaneously, the above results are the maximum values of RF exposure to the persons, and are far below the MPE limit (1.0 mW/ cm²). Therefore the LMA transmitter meets the MPE requirements for general Population/Uncontrolled exposure.

2. RF Exposure evaluation for co-located Bluetooth transmitters

The applying host device supports two kinds of Bluetooth devices as follows.

	FCC ID	Grantee Name	Product Name	Granted Date	ERP in FCC Test Report
User's option	PI4BT-IBM-PCII	TDK Systems Europe Ltd.	Bluetooth PC Card II	August/21/2001	1.0mW
Built-in type LMA transmitter	ANO20020100MTN	IBM Japan, Ltd.	IBM integrated Bluetooth with 56K Modem	Under inspection with this application	2.5mW

Collocated Bluetooth options for ThinkPad R50 Series



The main and auxiliary antennas placed at LCD section of the host device (ThinkPad R50 Series) are assembled apart from each Bluetooth antenna shown in the previous page with 20 cm or more.

Therefore the RF exposure evaluation for those Bluetooth transmitters is allowed to be examined independently of the applying WLAN antennas. In other word, the SAR testing for the applying transmitter in co-locating with those Bluetooth options is not required thanks to the following reasons.

When a customer operates the applying PC on one's lap, the sufficient separation distance (minimum 20cm) between the above Bluetooth antennas and the person's body (lap) can not be maintained.

But the footnote of the Section 3 in Supplement C to OET Bulletin 65 states :

“¹⁴ If a device, its antenna or other radiating structures are operating at closer than 2.5 cm from a person's body or in contact with the body, SAR evaluation may be necessary when the output is more than 50 – 100 mW, depending on the device operating configurations and exposure conditions.”

The total output power of the three Bluetooth transmitters in the previous table does not exceed 5mW. Therefore these transmitters also satisfy the RF exposure evaluation regarding CFR 47 Part 15.247(b)(4) without a SAR compliance test report, and can operate with the applying transmitter simultaneously.

IBM Web site guides customers about the **grant condition** concerning those collaborating transmitter devices. See the next page.

3. IBM Web site for user's guidance concerning the co-located transmitters

Note) The info for the applying LMA transmitter is not available until the product announcement.
<http://www.pc.ibm.com/qtechinfo/MIGR-43693.html>

The screenshot shows the IBM PC support website. The main heading is "TP Wireless Systems – Approved wireless Mini PCI options and additional RF option devices receive FCC certification". Below this, it lists "Applicable countries/regions" as "United States" and "Service hints & tips" as "Affected configurations". It states "Additional RF Option devices receive FCC certification for use on:" and lists "BIOS group 1".

LMA (Limited Modular Approval) adapters	FCC IDs	Approved ThinkPad models	PC options allowed multiple transmission		
			#1	#2	#3
IBM High Rate Wireless LAN Mini PCI Adapter	ANO M3AWE56GA	R32 Series T30 Series X30 Series (X30)	NG	O	O
Cisco Aironet Wireless 802.11b	ANO U58 H004				

BIOS group 2

LMA (Limited Modular Approval) adapters	FCC IDs	Approved ThinkPad models	PC options allowed multiple transmission		
			#1	#2	#3
Cisco Aironet Wireless 802.11b	ANO U58 H004	R40 Series T40 Series X30 Series (X31)	O	O	O
Intel PRO/Wireless LAN 2100 3B Mini PCI Adapter	ANO20020201CLK	R50 Series R40 Series T40 Series X30 Series (X31)	O	NG	O
IBM 11a/b/g Wireless LAN Mini PCI Adapter	ANO20030400LEG	R50 Series R40 Series T40 Series X30 Series (X31)	O	NG	O
IBM High Rate Wireless LAN Mini PCI Adapter III	ANO20020200BRX	G40 Series R40 Series	NG	NG	O

NOTES:

NG: Not authorized to use by the FCC rule, or not recognized by BIOS.

#1: FCC ID: ANO20020100MTN Option Name: [IBM Integrated Bluetooth with 56K Modem](#)

#2: FCC ID: P14BT-ULTRA Option Name: [Bluetooth UltraPort Module from IBM](#)

#3: FCC ID: P14BT-IBM-PCI Option Name: [Bluetooth PC Card II](#)

Solution

The supplementary document of ThinkPad's "Service and Troubleshooting Guide" has the following information in "Wireless regulatory information – USA Federal Communications Commission (FCC)" section:

Use of wireless options

Please make sure of the following conditions on use of wireless features.

1. Visit the IBM site at www.ibm.com/pc/qtechinfo/MIGR-43693.html and confirm the updated list of RF option devices that have been approved to cooperate with the integrated wireless feature.
2. When you use any other RF option device that is not listed on the IBM site, all other wireless features including the integrated transmitter in your ThinkPad computer are required to be turned off.
3. Users are requested to follow the RF Safety instructions on wireless option devices that are included in the RF option device's user's manual.

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