

April 28, 2003

RE: Hewlett Packard

FCC ID: CNTPP2080

[Answers to the ATCB comments on the above referenced Application.](#)

1. Please note that there is more than sufficient room for the 2 condition statement required in 15.19 to be placed on the outside of the laptop. Please provide a sample of this label and a dwg showing where it will be located on the device.

[Per Intel Corp: "The system label contains the FCC in home or office logo \(on the system label location drawing\). If you look at these labels they are quite busy and filled up there are 3 – 4 labels already on the bottom of the laptop for various items. These statement can and are in the user guide provided, which according to the FCC is ok."](#)

2. Please note that your report shows the spurious radiated meter readings then a corrected readings but does not show the factors used nor the manner in which the corrected readings were obtained. Please provide these factors in the tables.

[Refer to "Test Report – EMC \(Rev. A, 04-28-02\)".](#)

3. Please note that page 13 of 47 (pdf page 32) of your report states the 2387.73MHz is a peak reading that are over the 54 dB 15.209 limit. While you have shown 2390 Averaged reading, you have not made it clear if this is the same frequency as 2387.73 MHz. If this is the same frequency please be aware that this is a 2MHz difference and may be too great a frequency variation to be considered reliably the same frequency. Please show compliant averaged data for the frequencies measured in the restricted band of 2310-2390MHz.

[Refer to "Test Report – EMC \(Rev. A, 04-28-02\)".](#)

4. Please note that the antenna specs state the antenna is for 2.4 GHZ and 5 GHZ operation. The application and documentation justifies 2.4GHz. Please verify that the antenna is only for use in the 2.4GHz range.

[Per Intel Corp: "The OEM Laptop vendors have been using these dual band antenna elements in most instances due to their different SKU options. This filing and FCC ID will only be used with the WM3B2100 Intel WLAN Card operating at 2.4GHz \(802.11B\) this card does not have the ability to operate at 5GHz. The OEM vendor has been informed and knows that if they use a card other than the Intel WM3B2100 they would need to re-test and apply the applicable FCC ID."](#)

5. Please provide the correct SAR report for this device. Page 2 of the SAR report states the device is FCC ID: E2K24CLNS. Please note that the FCC ID for this application is FCC ID: CNTPP2080. Please also verify and correct all SAR documentation to reflect the proper applicant information for this device.

[Refer to "Test Report – SAR \(Revised\)".](#)

6. 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.

[Refer to "Power Attestation1, Power Attestation2 and SAR Conversation with FCC".](#)