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

April 6, 2004

RE: Compaq Computer Corporation

FCC ID: CNTPP2170SIL

After a review of the submitted information, I have a few comments on the above referenced Application.

General

1) It appears that the antennas for the bluetooth and 802.11 devices may be < 20 cm and therefore considered as co-located. However, the RF exposure information does not appear to address this issue. Please explain/correct the exhibits as necessary. Additionally, please provide information to show the distance of the antenna relative to the other antennas.
2) Please explain the gain column shown in the power measurements. Additionally, it is uncertain how this factors into the formula for determining power. Note that the power methodology given states the device was directly connected to a power meter.
3) It does not appear that all SAR plots were provided for the tabular results shown. Additionally, it appears that some SAR plots provided do not appear in the tabular results. Also, the maximum SAR plot from each device positioning does not appear to be provided. Please explain/correct as necessary.
4) The SAR test report states the duty cycle was 93%, yet a crest factor of 1 appears throughout the testing. Please explain and justify the use of crest factor of 1.
5) The SAR test report does not appear to contain:
   a) descriptions of extrapolation procedures used to estimate SAR values adjacent to phantom surface (unreachable due to probe case and boundary effects)
   b) descriptions of within-cube interpolation procedures to get 1 mm or 2 mm SAR grid
   c) description of averaging (integration) procedures to get 1-g SAR from final interpolated grid

   Please provide this information.
6) The FCC expects consistency in liquid parameters in calibration, system verification, and device testing. The conductivity given from the calibration of the probe at 2450 MHz for its calibration factors is not within 5% of the value within tissue conductivity used for testing. The FCC requires conductivity to be within consistent within 5%, but this appears to be about 10%. Please provide testing or calibration information that meets this requirement.

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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.