

Hi Mary Ellen

Please note that some of your responses do not adequately address the comments.

They are address them as follows.

Item 1 – the response to this item is OK.

Item 2 – see previous email listed below.

Item 3 – the response to this item is OK.

Item 4 and 7 – the response to this item is OK . FCC ID on new label OK. However, new label does not address the 2-condition statement required by 15.19 but the explanation provided for item 7 should be adequate.

Item 5 - Please note that in your response you state that the application is not an LMA for the WLAN and that the entire system was to have the FCC ID. This would indicate that the Tablet PC (under 15B Personal computers and peripherals) and that the Bluetooth device (under 15C 15.247) is being certified. You also state, "As stated in item 2 above, the Test Report FC03-051 contains transmitter data." Please note that the 731 is specific to the WLAN device operating in the 2412 to 2462MHz range ONLY and does not cover the Class B Tablet PC nor the Bluetooth 2402 to 2480 MHz device (item 7 of the 731 is checked no for composite device). Please also note that neither report number FC03-51 nor FC03-51A contains transmitter testing for the Bluetooth device (These tests include Power, Bandwidth, Dwell, number of hopping channels, radiated spurious emission in the restricted bands, etc)

If the entire system is the EUT, then this would necessarily be a composite device certified under two or more rule parts. The digital portion would be under 15B (computer peripheral devices under TCB scope A1) and the WLAN and Bluetooth under 15C (15.247 under TCB scope A4). This approach is fine as long as all issues are addressed in the application documentation.

Please note that if the EUT is the entire system containing the Computer, WLAN and Bluetooth, then the device must be sold with all devices. The manual states that the Bluetooth is "Not available in all models". Again, if the Bluetooth is part of the certification, then this is not acceptable as the grant would no longer apply to the device without the Bluetooth. If the Bluetooth is not part of the certification, then this must be addressed by evidence of the required "Contains FCC ID:XXXX" label that will be used on the outside of the Host.

As mentioned in the comment, if this Bluetooth device has an FCC ID number already, then evidence of the associated label requiring "Contains FCC ID:XXXXXX" on the outside of the host needs to be provided and/or explained in the application. As neither the EMC nor the SAR report address the Bluetooth device it would appear that this would be the case.

If the Bluetooth device is part of the composite certification of the Host, then full testing of the Bluetooth device must be provided in the application (i.e. testing of the WLAN only is not sufficient). In either situation, the Bluetooth device must be addressed. Please provide either a sample of the label that will be on the host declaring the FCC ID number of the Bluetooth device, or please provide the associated test data for the Bluetooth device in the report. Please also note that if this is a composite device for certification under 15B (computer device) and 15C (15.247) then the 731 needs to clearly identify this and the subsequent information needs to be provided.

Please provide an adequate explanation of the Bluetooth role in this application and please provide the necessary information required for either approach.

Item 6 – OK depending on answers to item 5

Item 9 – OK

Item 10 – OK

Item 11 – OK

Item 13 – not addressed

Item 14 – OK

Item 15 – OK

Item 16 – OK (FCC may disagree)

Item 17 – Please note that the WLAN antenna closest to the Bluetooth device is within approximately 15cm of that device (see page 5 of the internal photos exhibit). According to the theory of operation, the two WLAN antennae are operated as diversity antennae and that either antenna can be used by the PA (see page 3 of the theory of operation). This means that it is possible for the closest antenna to be used in transmit mode. While the reported SAR values are under 1w/kg and while it is not expected that the Bluetooth would cause significant problems, current interpretations from the FCC are that antenna(s) less than 20cm separation are considered collocated. As such, the Bluetooth device should be turned on during at least the highest SAR configuration to show that it does not significantly vary SAR values..

-----Original Message-----

**From:** dward [mailto:dward@atcb.com]

**Sent:** Thursday, October 09, 2003 10:17 AM

**To:** 'reports@ckc.com'

**Cc:** Bill Graff - ATCB (whgraff@americantcb.com)

**Subject:** CNTPP3006\_ATCB000808

Hi Mary Ellen

Please check your response to item 2 (external photos).

As you know the FCC requires separate exhibits for certain items (external photos being one of them).

Please note that while certain photos in the internal photo exhibit show the host in various conditions of disassembly, they are not external photos of the host itself.

The following are the exhibits uploaded for the application.

Additional Information

Block Diagram

Cover Letter

Form 731

Internal Photos

Label Location

Operational Description

RF Exposure Info

Schematics

Test Report

Test Setup Photos

Users Manual

Please note that External photos are not part of these exhibits. Perhaps there was a problem in the original upload. If you could email the external photos of the host device, I

can make sure they get on the server. If you are using other photos in other exhibits as the external photos, please advise in which exhibits these external photos are located.

For expediency, I can continue with the review and, assuming all is ok with the other comment responses, issue the grant. However, please note that the external photos are required and do need to be provided.

Thanks  
Dennis  
ATCB