

3rd October 2003

Mr. James K. Baer

Intel Corporation
San Diego CA

Re: FCC ID CNTPP3006

Applicant: Hewlett Packard

Correspondence Reference Number: Not Recorded

Confirmation Number: Not Recorded

Dear Mr Baer,

Having reviewed the questions submitted by CKC I can provide additional information in support of the application.

Question 1 (D).

D - Regarding the SAR Test Report. Please note that TCBs must use 1528 and OET 65C. Section 5.2 of the SAR report states that 1528 section 7 was used "where applicable". Please explain, if any, the parts of section 7 of IEEE1528 that were not "applicable" or that was not followed.

Answer.

1528 is a substantial document with multiple sub-sections contained within each main headed section. Having been one of the key contributors to the creation of this standard I should point out that IEEE-1528 was created ONLY to cover devices which can be used while located near or adjacent to the head. As this device is primarily used either on a desk, or while located in the lap of a user NOT all of IEEE-1528 in its current reiteration is applicable. Within section seven of the IEEE-1528 standard, routines for assessing devices which are primarily cellular/wireless telephones are described, these would NOT be applicable. Details relating to averaging methods, test reporting, equipment lists, validation considerations, and uncertainty considerations ARE applicable.

Question 2 (E).

E - Regarding the SAR Test Report. It would normally be expected that some power drift between the before and after power measurements during testing would occur. The data table in section 6.1 of the SAR report states that there was no (immeasurable) power drift between the before and after time frame. This seems unusual. Please explain (i.e. measurements were only done to tenth dB accuracy, etc).

Answer.

After an initial period of around five minutes the output Tx power becomes stable and does not deviate from the power setting/expected output power. APREL Laboratories have assessed between 15-20 of these cards, in various platforms, and have observed data similar to that which is included in the test report. Had the device under test been a wireless handset/PDA then I would have expected to see deviation from the measured output power or drift. It should be noted that when using the battery cell the unit can operate comfortably for periods which exceed the time needed to assess the device for measurable SAR.

Question 3 (F).

F - Regarding the SAR Test Report. Please note that data for graphs 2 and 4 (body SAR) have been provided. However, the data associated with graphs 5 through 9 has not. Please explain and please provide the associated measurement data with the graphs.

Answer.

All projects executed, documented and reported by APREL Laboratories, are fully reviewed using the FCC check list. The results documented relate to the "Conservative" SAR measured, and where the SAR result is close, or below noise floor levels, we do not include all of the Z plots/reports. The area plots are included to prove due diligence has been maintained for the SAR Assessment process. In reference to the FCC requirements for a SAR report and following the check list it has been observed that is a preference that all plots be included, and NOT a requirement. I have included these in the updated PDF.

Question 4 (G).

G - Regarding the SAR Test Report. It is not clear if SAR was evaluated with both the WLAN and Bluetooth device operating simultaneously. As the power of the Bluetooth transmitter has not been disclosed, what has been done to evaluate the affects on SAR of the Bluetooth transmitter operating in conjunction with the WLAN?

No tests have been carried out for SAR following the co-located requirements. APREL Laboratories understand that the device as tested would be exempt from said testing.

I have included If you require additional information then please let me know in the first instant.

Best Regards,

Stuart Nicol.
Director Product Development,
Dosimetric R&D.