



EMC Technologies Pty Ltd
ABN 82 057 105 549
57 Assembly Drive
Tullamarine Victoria Australia 3043

Ph: + 613 9335 3333
Fax: + 613 9338 9260
email: melb@emctech.com.au

DATE: 5th July 2005
Report Reference: M050511

To: Stan Lyles
Stanley.Lyles@fcc.gov
FCC Application Processing Branch

Re: FCC ID EJE-WB0029
Applicant: Fujitsu Limited
731 Confirmation Number: EA418567
Correspondence Reference Number: 29123

FCC Question:

1) Tablet edge in contact with phantom may need SAR test if that represents some normal or expected use position, e.g., device has display orientations (0/180 portrait, 0/180 landscape) which allow regular contact with torso when cradled in forearm or lapheld. For high-output channels, please submit SAR if appropriate.

Response:

According to Federal Communications Commission OET Laboratory Division March 18, 2004 titled *"Mobile and Portable Device RF Exposure Equipment Authorization Procedures"*, Section 7d) ii) the Tablet (notepad) computers are tested in a lap-held position with the bottom of the computer in direct contact against a flat phantom. In part 7d) iii) 2) the SAR data for a lap-held position is not required for antennas located in the display section of a notebook operating with lid closed; SAR data for lap-held or underarm (like a book) lid-closed positions when voluntarily submitted is considered and reviewed during equipment certification.

The data that we submitted is voluntary for the Tablet position; the required Lap Held position yielded a SAR result within the noise floor of the DASY4 system.

Previous to reviewing this referenced FCC document we were conducting SAR tests in the Tablet, Arm-Held and Edge positions.

The laptop denoted "Sadalam" part of this submission has only cosmetic changes with respect to those tested previously. Also this device is not a pure tablet PC. It is a normal laptop that has swivel LCD and convertible to tablet. The distance between the antenna and the edge surface is greater than the distance between the antenna and the top surface (tablet position).

FCC Question:

2) DTS filing has 5.8GHz band but only 2.4GHz SAR report - please submit 5.8GHz SAR report into DTS application.

Response:

The SAR report supplied is common for the DTS (5.8 GHz) and the UNII (5.2 GHz) portion of the filing. The SAR report has been common for all our previous submissions.



NATA Accredited
Laboratory Number: 5292

EMC Technologies Pty. Ltd., 57 Assembly Dve., Tullamarine, Vic., 3043, Australia.
Phone : +61 3 9335 3333 Fax: +61 3 9338 9260 www.emctech.com.au