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

October 24, 2002

RE: ASKEY COMPUTER CORP.

FCC ID: H8NWLL030M (Permissive Change)

After a review of the submitted information, I have a few comments on the above referenced Application. These comments are all made upon the assumption that the EUT's full conducted output power is 31.2 mW and the antenna gain is 1.5 dBi as specified in the information provided.

1) Please provide RF exposure information for the additional antenna being added to the application.
2) We have recently been informed by the FCC that we must carefully consider RF safety issues during permissive change applications, especially in light of changing RF exposure requirements in the past several months. Please note that any use of this device must meet the 20 cm spacing requirement from the antenna to the user (as conditioned in the original grant). However the original application appeared to provide photographs with the antennas installed in the base of a laptop (which may of originally been allowed at that time). Please note that permissive changes must meet with the current RF exposure requirements. Therefore the manufacturer must be aware that positioning the antennas in the base of the laptop is not allowed since this does not provide the typical 20 cm spacing should the user decide to user a laptop in their lap. For this device, the antennas may only be positioned in the lid portion of a device in a fashion to ensure the 20 cm is met during use of the device. Please provide information to support that the manufacture is aware of this fact and that if they sell this device to integrators, that they provide proper guidance to the integrators with respect to this issue. For instance, updated users manuals that address this issue, or specific instructions that they provide to integrators.
3) Their appears to be a difference of about 6-10 dB between the two versions (section 4.2 of the repot) given in this report for the radiated fundamental output for all channesl. We would expect the radiated output (given an external antenna) to be very similar between the two versions. Please explain or provide new spurious test data if one version is found to not be properly operating or configured for the test.

Timothy R. Johnson
Examining Engineer

Direct Phone: 404-414-8071
mailto: tjohnson@AmericanTCB.com

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.