



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

October 2, 2002

RE: ACCTON TECHNOLOGY CORPORATION

FCC ID: HEDACCWN3302A-1

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 32 mW and the antenna gain is -1.0 dBi.

- 1) The responsible party located on the DoC information sheet must be located within the U.S. Please provide a corrected copy.
- 2) The EUT is a PCMCIA Card. The operational description and RF exposure exhibits provided state that the device will be positioned 20 cm from the user. General purpose PCMCIA cards must be considered as used in a variety of devices, including laptops & PDA's, etc. Some of these devices may be used in the lap or while on the body. Therefore touch position is considered applicable and the device must be subject to portable exposure conditions. Please provide further information to support the 20 cm or provide RF exposure exhibits meeting the portable category.
- 3) The users manual states that the output power is +15 dBm minimum, +17 dBm typical. Please note that the maximum output power measured was 15.1 dBm. Please explain as it is assumed that the device may not have been in a maximum TX condition.
- 4) Please note that the FCC has recently changed how to treat these types of devices (general purpose PCMCIA cards) for MPE/SAR related issues. Both 20 and 2.5 cm are no longer considered acceptable spacing for general PCMCIA cards based upon specific laptop configurations that can occur. The FCC has instructed us that we must consider that these device might be used in a touch position to the body. Assuming this device is for general purpose use please:
  - a) Adjust the appropriate exhibits so that the device should be classified for portable and/or mobile use.
  - b) Since the output power (either conducted or EIRP, Conducted = 32 mW, EIRP = 25.4 mW) exceeds 24.6 mW (60/f calculated), this device will require SAR testing. Please note that testing must be performed in a touch position to the SAR phantom. Alternatively, the power may be lowered such that the conducted and EIRP is less than 24.6 mW.
  - c) If SAR testing is performed, the Users Manual should contain information regarding the device and that it has met with SAR requirements. Additionally the current MPE statements would need to be modified.
- 5) NOTE: Due to concerns on how to treat the device for RF exposure as given above, the test report has not been reviewed at this time.

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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.