



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

October 8, 2002

RE: FCC ID: I8g8800003
Attention: Eric Wong

I have a few comments on this Application.

- 1 Please note that the following documents are not readable by the FCC server because they contain Asian or other non-English fonts. Block Diagram, Operational description, Parts list, Test Report. Please provide these documents as pdf without Asian or other non-English fonts. xxx
- 2 The report states that an external antenna is used. (See page 11 of the report). However, all photos of the device show the antenna to be internal to the device. In addition, the schematics show 2 on board antenna(s) and one external antenna port. Please also note that the PCMCIA card has a power in excess of 25mW and is quit capable of being used on the lap within 2.5 cm from the body. As such, the FCC requires SAR testing of this device. Please provide the SAR report for this device in a typical laptop or appropriate device. Alternately, please fully explain the external antenna described in the report and how it is attached to the laptop to insure 20cm separation from the user (this includes photos of how this is attached to the laptop). You will also have to provide evidence in the schematics of how the internal antennas are disabled so as not to operate. You will also have to revise the manual to show how the antenna(s) are to be attached to the lap top to insure 20cm separation. xxx
- 3 Please note that the label appears large enough to accommodate the 2-condition statement. Please provide a revised label or please explain why you feel the statement does not need to be on the device. xxx
- 4 Please explain the use of the external antenna connector J1 in the schematic. See item 2. xxx
- 5 Please note that as of September 9, 2002 the FCC conducted limits go to 15okHz. If you wish to continue using the older limits, please provide an attestation to 15.37 Transition provisions for compliance with the rules. xxx
- 6 Please note that the FCC regulatory information in the RF exposure section of the manual is incorrect. The correct FCC document is OET65C not OET64C. Please correct the reference. Also, please note that since this device looks like it requires SAR testing, you will also have to include the maximum SAR values measured during this testing. xxx
- 7 Please note that since this is a PCMCIA WLAN card and it will be used in a laptop computer PCMCIA slot, there is no way to enforce the caution statement about keeping 20cm distance from the device and the user if the device uses its integral antennae. Also, since this device is greater than 25mW output, it will require SAR testing. This caution statement will have to be changed to reflect the maximum SAR levels measured. Also, the statement will have to be changed to reflect that 2.5cm distance is to be observed when used in a laptop. xxx
- 8 The non modification statement needs to caution the user that modifying the device may void the users right to use the device. The current statement only states that it may violate FCC regulations but does not address the fact the it may also void the users right to use the device. Please make this statement clear and unambiguous about this issue. xxx

Dennis Ward
<mailto:dward@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.