From: Raymond Laforge [RLAFORGE@fcc.gov] Sent: Monday, January 22, 2001 10:53 AM

To: rwg@itsqs.com

Subject: Re: TCB review of 15.247 device

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Both of the devices described would be approved by the Commission as a limited modular transmitter. By limited, I mean it would have some restrictions/conditions listed on the Grant of Equipment Authorization.

The TCB may process these devices if they believe there are no RF safety issues involved in the processing of the devices.

>>> <rwg@itsqs.com> 12/22/00 03:29PM >>> Dear Sir:

We have been asked to review two 1 mW EIRP Bluetooth devices:

- 1) PC adapter, for wireless connection to remote printer. It is a PC card for an internal PC card slot, with built-in antenna.
- 2) Printer adapter, attaches to a printer's parallel port. It has an integral antenna.

Both devices are below the EIRP limits in the TCB exclusion list of December 18, 2000 (section VI, paragraph e.vii.1). However, the same exclusion list disqualifies 15.247 transmitters which "operate as a module, including those that are installed in, or attached, to another product" (section VI, paragraph e.iii). While neither of these devices qualifies as a module per FCC Interpretation Letter #1105, each is intended to be "installed in, or attached to, another product."

May a TCB certify these devices?

Thank you, Roland Gubisch ITS