

Chris Harvey

From: Chi Tsou [chi.tsou@ccsemc.com]
Sent: Wednesday, July 28, 2010 12:36 PM
To: Chris Harvey; Claire Hoque; Chris Harvey; Chris Harvey -TCB
Subject: RE: answer 10U13275 TCB questions: Broadcom Corporation, FCC ID: QDS-BRCM1051, Assessment NO.: AN10T0568, Notice#1a
Attachments: document between you and FCC regarding no radiated emission test requir... (31.5 KB)

Hi Chris,

I'll try to address this question though it is the first time such a question been asked:-)

I am itemizing my comment as follows:

1. I don't know if the TCB certifier has ever checked the original FCC grant/submission or not which I hope he(or she) did then he (or she) would know there is a new antenna for this application. The original peak ant. gain is 3.9 dBi vs 2.0 dBi for the new antenna gain and we all know that if a new antenna has the same type as granted but with lower gain, no need to file C2PC as the BE emission will still comply.

2. The purpose of this application is to add a portable host. According to the FCC's response back in 2008 September, as long as the following conditions are met, no EMC re-assessment required:

Conditions:

1. Class II permissive change filing by installing an approved WLAN module in a portable host
2. The portable host is laptop computer (Non-Tablet)
3. WLAN module has received single module approval.
4. WLAN TX antenna(s) is located within 20 cm separation distance thus SAR evaluation is required.
5. WLAN TX antenna(s) is not shared by any other transmitter.
6. WLAN TX antenna(s) in this portable host is the same type of antenna with less gain.
7. WLAN module is a client device and DFS evaluation is not required.
8. WLAN module is not transmitting simultaneously with other transmitter. If it does transmit simultaneously, the antenna separation distance is more than 20 cm.
9. No modification has been made on WLAN module.

If all above conditions are met, EMC evaluation is not required. In this Class II permissive change filing, only SAR test report, and all other related attachments (host user manual, host ID format, internal photos etc) are required.

Please notify the TCB certifier of the above important FCC rule that way we won't be asked the same question for similar future submissions:-)

Therefore I don't think any BE re-assessment nor C2PC letter modification is required.

Kindly issue the grant ASAP.

Thanks and best regards,

Chi

-----Original Message-----

From: Chris Harvey [mailto:charveyemc@gmail.com] On Behalf Of Chris Harvey
Sent: Wednesday, July 28, 2010 8:16 AM
To: Claire Hoque; Chris Harvey; Chris Harvey -TCB
Cc: Chi Tsou; Tina Chu
Subject: RE: answer 10U13275 TCB questions: Broadcom Corporation, FCC ID: QDS-BRCM1051, Assessment NO.: AN10T0568, Notice#1a

Claire and Chi, the TCB Certifier has requested additional information to ensure continued compliance of this module as described in this application.

The C2PC cover Letter indicates that there is 'no hardware or electrical modification', but did not address if there are any changes to the antennas that have already been approved with this device.

The Certifier noted that:

"The indicated margin for band edge compliance for both Peak and Average is less than 1 dB. As you know, putting any antenna in a new platform will change the radiated parameters. Since this module is now in a new host; Is this the same identical antenna?

Will the band edge emissions continue to comply?"

The antenna description has been submitted in this application, but no

explanation can be found as to the previous antennas or if this is the same antenna as previously used. Please provide additional information on these antennas in reference to previous approvals and address the question about continued compliance of the band-edge emissions with regards to the small margins as previously reported.

Please contact me if you have further questions.

Best regards,

Chris Harvey

-----Original Message-----

From: Claire Hoque [<mailto:claire.hoque@ccsemc.com>]

Sent: Monday, July 26, 2010 8:08 PM

To: Chris Harvey; Chris Harvey -TCB

Cc: Chi Tsou; Tina Chu

Subject: answer 10U13275 TCB questions: Broadcom Corporation, FCC ID: QDS-BRCM1051, Assessment NO.: AN10T0568, Notice#1

Hi Chris,

A1: OEM Installation Guide is attached.

A2: pls see revised SAR report

A3: pls see revised SAR report

Thanks,

Claire Hoque

UL CCS

47173 Benicia Street

Fremont, CA 94538, USA

Tel: (510) 771-1123

Fax: (510) 661-0888

-----Original Message-----

From: charvey-tcb@ccsemc.com [mailto:charvey-tcb@ccsemc.com]
Sent: Monday, July 05, 2010 12:20 PM
To: Thu.Chan@CCSEMC.COM
Cc: chris.harvey@ccsemc.com; claire.hoque@ccsemc.com
Subject: Broadcom Corporation, FCC ID: QDS-BRCM1051, Assessment NO.:
AN10T0568, Notice#1

Dear Claire and Thu,

You are listed as the Technical Contact for the above referenced TCB application. The following items need to be resolved before the review can be continued:

1. The Confidentiality Request Letter exhibit requests Short Term Confidentiality of the OEM Installation Guide, but this installation Guide was not submitted, but rather a Users Manual was submitted. The Users Manual submitted contains no FCC Notices or RF Exposure information for the user. Please provide the Users Notices and the Installation Guide.
2. The SAR report section 10 for Output Power Verification contains no power measurement data but rather states that the power was verified and was in agreement with previous reported average output power. Please update the SAR test report to include the measured average output power.
3. Also, please note that the Grant is requesting 2412 - 2472, but the SAR report only listed 2412 - 2462 MHz (although testing was not needed at the high/low channels anyway. Please update the SAR report to document the full operational band of this EUT.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested

information within 30 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee. 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 e-mail address listed below the name of the sender.

Best regards,

Chris Harvey

Charvey-tcb@ccsemc.com

<<FW: document between you and FCC regarding no radiated emission test required for class permissive change>>