Memo

No: memo112

To: Timothy Johnson ATCB.

From: Roland Croteau, Bay Computer Associates, Dick Wiedeman Test Site Services, Shawn McMillen Metlabs.

CC: Mary Ellen Heinen,

Date: July 19, 2005

Re: Response to ATCB Comments on 7/19/05 relative to FCC submission S5Y1234

Tim

The following is our combined response to your comments relative to our submittal for the Pepper Wireless Pad FCC ID: S5Y1234.

Comment 1 Answer : The Bluetooth module from Infineon resides directly on the main PWB. I have added two pictures to the internal photos, showing its location & internal circuitry, bumped the revision to 04, and uploaded the document to the ATCB website.

Comment 2 Answer : We have uploaded Bluetooth and Wifi reports which address all comments to the ATCB site.

Comment 3 Answer : An updated form 731 has been uploaded to the ATCB website.

Comment 4 Answer : The confusion here is that we presented the three graphs for *illustration only* and they were *not* used for the determination of the PSD (see explanatory note on page 22); therefore we were not concerned with the sweep rate.

The measurements presented in the summary table on pages 21 and 22 were taken as single frequency manual measurements with the HP8566B spectrum analyzer with rbw=3 kHz, vbw=30kHz , zero span, and auto sweep(see page 21 of report). In the case of zero span and auto sweep, the sweep rate requirement of span/3k was met for these measurements

Comment 5 Answer : The duty cycle of 25% was used which represents actual usage. A duty cycle of 100% was attainable but with no data rate control. On page 8 of the test report, item #8 identifies the steps carried out to insure the accuracy of the RF

exposure. The E-field probe diodes act as positive peak detectors capturing 2604 data points/sec. It is assumed that with a sampling duration a 2 seconds the peak was detected.

Pg 8, #8 of SAR Report -- The measurement results were either at or near the noise floor of the SAR system. In order to verify that the measurement results were accurate, various scans were performed at different sampling durations. An initial area and zoom scan was performed using a 0.5 second sampling duration. An additional area and zoom scan was performed using a sampling duration of 2.0 seconds. Both plots produced the same SAR distribution. It is therefore assumed that the SAR plots represent the actual RF exposure for this device.

Comment 6 Answer : The duty cycle was adjusted to 1:4 and the SAR distributions were recalculated.

Comment 7 Answer : There is only one manufacturer and model/type of battery employed by the Pepper Wireless Pad. This battery is not user replaceable.

Comment 8 Answer : To assure consistency between the Metlab and TSS testing, Metlabs is in the process of updating their report to include EIRP level data instead of conducted levels. I will have this document in the morning.

Please do not hesitate if any further information is needed from Dick, Shawn, or myself.

Regards

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