

FCC Q and A June 7, 2012

From: Claire Hoque, claire.hoque@ul.com

To: Jyun-Cheng Chen, JC.Chen@fcc.gov

Re: FCC ID: UK2-SIL-SK63100

Applicant: Silicon Image, Inc.

Correspondence Reference Number: 41958

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1. Revised Quick Start Guide and OEM installation instructions have been reviewed. The important thing here is that the applicant should be aware that the application currently restricts itself to installation on laptop hosts (with lid) only. In addition, the device's antenna should be placed on the display section and no other antenna can be co-located within 20 cm of the device's antenna. Furthermore, regardless the thickness/height of the laptop base, the device needs to be placed at least 3.3 cm from the resting surface. The last two use conditions in fact make the module hard to be used by any OEMs without permissive change applications by the applicant. (Is it really necessary to get a modular grant if this is the case?) [<answer> pls see additional Operational Description document uploaded 6/7/2012. A modular grant was selected to allow the maximum possible leveraging of RF test results in the event additional configurations are desired in the future, with the recognition that a C2PC would very likely be needed.](#)

2. The revised OEM installation instructions contain some sentences which indicate that the applicant might have incorrect understanding of its responsibilities. The following statements are not correct and should be revised:

a. "the OEM/system integrator is responsible for determining whether the collocation conditions require a C2PC to address host-specific collocation conditions" - the grantee of the module is the responsible party if the module's FCC ID is used; moreover, only the grantee can apply for C2PC of a granted device, not the host integrator;
[<answer> pls see revised OEM Manual.](#)

b. "The OEM integrator is still responsible for the FCC compliance requirement of the end

product, which integrates this module" - the grantee of the module is the responsible party if the module's FCC ID is used;

<answer> pls see revised OEM Manual.

c. "System integrator/OEM needs to ensure that Host system shall have the ability to allow the end user to disable the transmitter when ... taken on-board aircraft" - the grantee of the module is the responsible party if the module's FCC ID is used; moreover, disabling the module is NOT an option to the users, the OEM, or to the grantee.

<answer> pls see revised OEM Manual.

Additionally, FCC Rules 15.250, 15.253, 15.255, 15.257, 15.521 include provisions that prohibit operation of certain unlicensed devices on aircraft, satellites [and other conditions, as applicable to particular Rule Parts]. The FCC has established a long-standing precedent that a statement in the user manual has been sufficient to show compliance to these provisions.

3. Theory of Operation 2 has been superseded per your 5/25 request. Please verify.

<answer> Correct

4. Module labeling requirements per KDB 996369 should be followed. The KDB also discusses the responsibilities of the module grantee that the applicant is advised to become familiar with.

<answer> See revised label and OEM manual.

Finally, we had a disturbing discovery that there was another equipment authorization application from another manufacturer which presented an MPE analysis identical to your confidential and proprietary analysis. Furthermore, the identical antenna array description operates at a much lower frequency band than the device here. Please verify the accuracy and originality of your document. If confirmed to be correct we will ask the other manufacturer to explain.

<answer> The MPE analysis document in this filing is accurate, original and correct. Thank you for following up with the other manufacturer.