



December 29, 2004

RE: FCC ID: E2K5HCKT  
Applicant: Dell Computer Corporation  
Correspondence Reference Number: 28132  
731 Confirmation Number: EA696653

[Answers to the FCC comments on the above referenced Application.](#)

1) Cover letter states "The Wireless and BlueTooth module is not considered co-located." Please address colocation based on co-transmitting guidance given at TCB trainings and other places over the past few years, and also 15.31(h), (k).

[Please refer to the revised "Test Report – 15.247 \(Rev. A, 12/29/04\)" and "Test Report – 15.407 \(Rev. A, 12/29/04\)". For the 15.247 report new data was added with the Bluetooth module on page 92 and the 15.407 report the data can be found on page 55.](#)

2) Please submit users manual for laptop, including any instructions specific for transmitter use or install. [Please refer to the "Users Guide – Notebook" and "Installation Guide" exhibits.](#)

3) Please explain compliance with 2.1033(b)(70 and Public Notice DA 00-1407 Modular Approval criteria #6: "if the FCC ID is not visible when the module is installed inside another device, then the outside of the device into which the module is installed must also display a label referring to the enclosed module." Submit revised labeling info and external photos if appropriate.

[Please refer to the "Label Artwork \(Notebook\)" exhibit.](#)

4) Power listed on Form731 is different from original filings - please justify results here and how this qualifies for a Class II change, and/or advise numbers and give justification for correction of Form731 powers.

original =

DTS 2.4ghz 257mW; 5.8ghz 126mW

NII - 5.3ghz 38mW

this filing =

DTS - 2.4ghz 260mW; 5.8ghz 138mW

NII - 5.3ghz 39mW

[For the DTS – 2.4 GHz and NII 5.3 GHz, the power levels are within 5% of the original filing. For 5.8 GHz please refer to the revised "Test Report – 15.247 \(Rev. A, 12/28/04\), Test Report – 15.407 \(Rev. A, 12/28/04\), and Form 731 \(15.247 DTS\) \(Rev. A, 12-28-04\)" for the corrected power level of 126 mW.](#)

5) Please submit internal photos with callouts and/or drawings showing antenna locations.

[Please refer to the "Antenna Locations-Distances" exhibit.](#)



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6) EMC report has the following output power ranges across several channels:

802.11b: 57-87mW  
802.11g: 237-260mW  
5.3ghz: 13-39mW  
5.8ghz: 129-138mW

SAR report has apparently channel-independent numbers:

802.11b: 93mW  
802.11g: 263mW  
5.3ghz: 39mW  
5.8ghz: 219mW

Please explain major and minor differences between SAR and EMC powers. Please explain how power was determined for SAR tests, and how device was setup to maintain a constant power across all channels, if those results are correct.

[Please refer to the "SAR Response" exhibit.](#)

7)-18) pertain to SAR

[Please refer to the "SAR Response" exhibit.](#)

7) In accordance with OET 65 Supplement C, please describe device transmitting setup and parameters for SAR tests.

8) Please explain how 95% duty factor used in SAR tests is established and is applicable for the device.

9) Please explain how 95% duty factor used in SAR tests is accounted for in SAR system, and explicitly carried through to determine final SAR values (e.g., include numerical example).

10) Please explain why SAR was tested with lid/display closed, and how these results are applicable for any intended and expected use positions when display is open.

11) SAR report section 5 has for liquid target values:

body	eps	sig
2450	52.5	1.78
5200	43	5.75
5800	48.2	6

These numbers do not seem to be in accordance with OET 65 Suppl C:

body	eps	sig
2450	52.7	1.95
3000	52	2.73
5200	49	5.3 (interpolated)
5800	48.2	6

Please explain and/or revise target values, for this and all future filings.



**AEGIS LABS INC.**

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12) Several labs presently are routinely achieving liquid parameter measured values within typical IEEE Std 1528 tolerances. Please provide strong justification for liquid parameters used here. For highest reported SAR in this filing, please estimate, e.g., using Kuster/Balzano theory or FDTD, the expected SAR that would be obtained using Suppl C parameters.

13) SAR report section 4.2 has probe tip radius less than 5mm, while probe calibration certificates have tip diameter at 5mm. Please confirm what is exact tip diameter for probe used here. Note that draft IEC 62209-2 recommends tip diameter less than 3 mm - in future filings please use 3 mm or less tip diameter.

14) In future filings please include tabular summary of all SAR test results.

15) Please explain number and selection of channels used for SAR testing.

16) Please provide summary of actual area scan and zoom scan grid dimensions and step sizes used in SAR testing. Please include justifications if these differ from any draft IEC 62209-2 recommendations.

17) In future filings please try to avoid including uncertainty budget with every SAR plot result, unless there are significant differences from plot to plot.

18) Please describe what intended and expected use positions are represented by positions used for SAR testing, including those in report section 6.6.