



To:	ATCB	Fax:	
Attention:	Timothy R Johnson	Phone:	
From:	EMC Technologies Pty. Ltd.	No of pages:	2
EMC Ref:	ATCB Query-3 response	Date:	4 th March 2004
Subject:	Information Request		

1) While your conclusion regarding the LCD displays appears logical in certain cases, we are not aware of any published official interpretation from the FCC regarding this issue. Please provide a copy of this interpretation for our review. Please note that we have seen LCD displays with/without metal backings or different circuitry which can affect the results of SAR. While similar construction around the antenna area (including metal) may be reasonable for your conclusion, information regarding the construction around the antennas (i.e. internal photos comparing these areas and/or detailed explanations of the metallic component differences around the antennas, etc.) has not been provided to us.

Yes, we understand your concerns.

The manufacturer has written to the FCC and obtained a ruling or acceptance after providing similar details as what is being submitted here to ATCB.

The FCC email correspondence has been included in the attachment provided for this item.

The same document is attached here after including the Antenna photos of the Ocamp models.

The manufacturer further states that the Antenna Board, LCD surroundings are identical in both Ocamp ST5010 and Ocamp ST5011. The ST5010D/ST5011D has a FCC Grant (FCC direct submission) already in similar circumstances where this Grant was for a different WLAN module.

We do not have references to any official interpretation other than the email correspondence provided and the fact that a Grant has been issued for an identical case.

The manufacturer has also stated that the Intel Calexico2 WLAN module and the Antenna boards are NOT specific for any Ocamp models. These items are common for ST5010 and ST5011 Ocamp models. This assembly is done by the manufacturer of the host unit Ocamp in a factory environment and the user is warned NOT to modify this assembly.

On this note we would like to advise that we will do another verification SAR test on the second Ocamp for the worst case and submit this along with Item 3 results.

2) Please note that we will accept the power discussion provided. However, in the future please be aware that the FCC asks the power to be compared so that variances in test labs (where 2 labs perform the tests), and/or samples (where multiple samples are assessed), and/or changes to the device can be determined. We have seen in rare instances where samples with the same settings have yielded significant difference of power or where the sample begins to behave differently at a later date (variety of reason). Without an adequate "apples - to - apples" comparison, the fact that the power is $\geq$ to the EMC can not be assured.

OK. Thanks. We note your points.

3) Since it is likely that only a small difference will be seen due to the retest due to the lowest measurement point, and the fact that any difference noted is not likely to cause non-compliance due to the low SAR value obtained, we will go ahead and issue the grant under the following conditions:

- a) Because of FCC requirements, please note that we will still need the retest information. Therefore, please provide the results of your retest as soon as possible. Please note that a complete retest is not deemed necessary; only the worse case positions. However, we must

have this information within the next 14 days to properly update the filing and adjust grant if necessary.

b) further detail in support of issue 1 above is provided.

This will be provided to you within the next few days.