



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

June 30, 2005

RE: First International Computer Inc.

FCC ID: EUNLM13WG

After a review of the submitted information, I have a few comments on the above referenced Application.

- 1) The 731 form, Section III, 6(a)/(b) appear to be incomplete or missing information. Please correct.
- 2) The block diagram should show the frequencies of all oscillators in the TX portion of the device (CFR 2.1033(a)(5)), unless this portion of the device is an OEM part from a different manufacturer. Please provide either the block diagram for the TX portion, or alternatively provide a parts list that clearly shows this part and the manufacturer of the part is different than the applicant. Please update the list of confidential exhibits if necessary. It appears that the block diagram shown in the operational description may be sufficient for the block diagram. Please review as necessary.
- 3) The schematics do not include the TX portion of the device. Note that a schematic for the TX portion of the device is required as specified 2.1033(b)(5) for the RF section. Please provide either a schematic for the TX card or as an alternative, you may provide a parts list that lists that shows that this part is provided by another manufacturer. If necessary, please update the confidentiality letter to include the parts list.

Note that for items 2 & 3, most Labs from Asia provide the block diagram and schematic of the mini-PCI card.

- 4) Section 15.15(b) prohibits adjustments of any control by the user that will cause operation of a device in violation of the regulations. Accordingly, any proposal to allow the end user to choose extended channels on frequencies outside of an allowable frequency band in the USA is not acceptable. For example, a WLAN device operating according to Section 15.247 on channels 1-11 between 2.4 - 2.483.5 GHz must not have any user controls or software to allow the device to operate on channels 12 and 13 which are outside of the allowed USA band. For instance, the user should not be able to select alternative countries which would allow different channel plans outside of the allowed USA band. Please explain how this device is compliant to this requirement.
- 5) Please clarify if you are asking for:
 - a) Certification of the device as a TX, and a DoC has been performed by an appropriately accredited test lab for a PC
 - b) Certification as a TX + PC

Note 1: The option b) would be considered as a composite application and 2 certificates (one for the TX, one for the PC portion) would be issued. There are additional review costs associated with this additional certification.

Note 2: To qualify to perform DoC applications, the test lab must be accredited by an acceptable agency and meet the requirement of 2.948(e) to perform testing under the DoC procedure and the device has additional labeling and manual requirements for the DoC. Currently labs from China do not appear as an accredited test lab on the FCC site under 2.948(e). Please explain as necessary.

Note 3: Note that for DoC tests, the device is configured with a minimum test configuration as specified by ANSI C63.4 which includes complete computer + 2 I/O devices attached (one may be the EUT).

Note 4: For the remaining part of this current review, it is assumed that the device is being approved under a DoC for the PC peripheral portion.

- 6) This device is being approved as a system. The users manual should not provide instructions to the user on how to remove/install/access the mini-PCI card. Therefore information such as item 4 on page 30 of 130 of the users manual should be adjusted. Other pages that would require modifications are pages 31 and Section 7.3 (page 115) should be corrected.
- 7) Please explain the LgAv denoted on the peak plots on pages 22 through 29. Shouldn't these be peak plots?
- 8) Please upload the RF exposure information in the report as a separate RF exposure exhibit. Additionally, please note that the FCC no longer desires that the safe distance for mobile devices be calculated in the RF exposure exhibit if the safe distance is < 20 cm, but instead prefers the power density results to be calculated at 20 cm and compared to the power density limit.
- 9) Page 46 mentions measurements < 1 GHz were made at 10 m. However limits appear to be shown at 3 meters. Please explain at what distance measurements were made and if not made at 10 meters, where are correction factors applied.
- 10) Page 47 mentions measurements > 1 GHz were made at 10 m. Due to FCC rules, limits, and dynamic range issues this is highly unusual. Additionally, limits are cited as 3 meter. Please explain.
- 11) There are several peak readings from pages 54 – 59 that exceed the average limits, but average measurements are not provided. Please note that the device must meet both the peak and average limits. Please correct as necessary.
- 12) The users manual does not appear to contain necessary RF exposure statements/information. Please update the manual to include these.
- 13) For Your Information (FYI).....It is uncertain if the original FCC ID on the mini-PCI card is still valid given the particular use and antennas given in this device. Since the original FCC ID is not being used and may not be correct, the FCC would prefer that the original FCC ID is removed, covered, or blacked out. This will avoid any accidental reference to a non-valid FCC ID should the consumer see this number.



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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. 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 sender.