



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

August 14, 2005

RE: First International Computer Inc.

FCC ID: EUNLM2WI

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

- 1) 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.

- 2) 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.
- 3) 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 portion.

- 4) The following information is confusing and should be reworded or removed from the users manual. Please correct.

15.247 (b)(4), the EUT meets the requirement that it be operated in a manner that ensures the public is not exposed to radio frequency energy levels in excess of the Commission's guidelines (1.1307, 1.1310, 2.1091 and 2.1093)

- 5) The users manual page 30 and 31 should remove item 4 from the diagram and list. The manufacturer should not provide any information to the user as to where to find or access the TX hardware.
- 6) Peak to average measurements of 802.11b appear to contain a higher delta than expected. This is likely due to the 802.11b being tested at the highest data rate. Note that the FCC expects you to investigate and determine worse case. Generally the lower data rate are seen to be worse case due to a higher spectral density and power. Were these investigated? Please review.
- 7) Conducted emissions suggest that the higher harmonics would likely occur at the 4th harmonic, however the test data does not show any data at the 4th harmonic. Please explain.
- 8) FYI....If the PC is subjected to a DoC, the users manual should contain all the following information on a single page. This information does not appear to be provided together in the manual as specified by 2.1077.

COMPLIANCE INFORMATION (47CFR 2.1077)

If a product is tested and authorized under a Declaration of Conformity, a compliance information statement shall be supplied with the product at the time of marketing or importation, containing the following information on a single page:

- (1) Identification of the product, i.e. name and model number.
 - (2) A statement similar to that contained in Section 15.19(a)(3) that the product complies with Part 15 of the regulations.
 - (3) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.
- 9) 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.