

May 21, 2001

Federal Communications Commission  
Equipment Authorization Division,  
Application Processing Branch  
7435 Oakland Mills Road  
Columbia, MD 21046

RE: EA95137  
Correspondence Number: 10373

Dear Sir:

Proxim Class II Change, EA 95137 -

1. Previous Class II Change had 481 mW listed on the grant (EA 92322, original was EA 73141 had no output rating listed). The current Class II is requesting 0.5 W, which is higher than previous maximum output. Increases in maximum output won't qualify it for a Class II change, it needs to be clarified or a new filing is needed.

***Actually this filing is against Proxim's Model 7521. The Proxim 7520 is the 100mW version. I see that in the report in section 1.2 Product Description, I inadvertently refer to the 7520. It should be the 7521.***

***No changes have been made to the Proxim model 7521. The output power should have been identified as 481mW. We at LXE generically call it a 500mW device.***

2. In the test report, section 1.2 - Product Descriptions, 4 antennas are specified with "Notes" allowing connector variations. The two LXE antennas do not require professional installation, as proposed in the filing, and non-standard connectors must be used. Notes 3 does not seem to apply, please clarify.

***Note 3 does apply as they are offered in different cable lengths, however they do not require professional installation because all variations use a unique connector arrangement.***

3. This is a Proxim 7520. Please clarify how would all the antennas listed for the 4 transmitters (6430-100, 6430-500, Proxim type 2 and Lucent) indicated in the RF exposure info apply to the transmitter in this particular filing. It appears only 2 out of the 25 antennas may apply to this application. Please revise the antenna list to include only antennas (4 total) applicable to this filing. The MPE distance at the end of the table should be revised accordingly with respect to requirements of 2.1091, 20 cm or more for mobile operations.

***Actually this filing is against Proxim's Model 7521. The Proxim 7520 is the 100mW version. I see that in the report in section 1.2 Product Description, I inadvertently refer to the 7520. It should be the 7521.***

May 21, 2001

***The 7521 is known internally at LXE as the 6430R5 and the Proxim Model 7520 is known internally as the 6430R1. See section 1.3, Definitions, of LXE document 156602-0001 previously uploaded. The document is an LXE document that instructs installers which antennas are approved for each of the four transmitters given. The information contained in the column for the 6430(500mW) in section 2.1, is pertinent to the Proxim Model 7521 and this filing. I apologize if it contains more information than you need. Please disregard all other transmitters. Also, section 3.0 of this document refers to ETSI requirements and should also be disregarded for your purposes.***

***We give LXE part numbers to all antennas whether purchased or manufactured. In the report I only gave the manufacturers model number and left off the LXE numbers.***

***For your reference, the Cushcraft S2403 has been assigned LXE p/n's: 153599-0001, 153600-0001, 480424-3402. As described in the notes of Section 1.2 of the report, the differences between the 3 p/n's are cable lengths and connector genders.***

***For your reference, the Cushcraft S2400 has been assigned LXE p/n's: 153179-0001, 153325-0001, 480424-0400. As described in the notes of Section 1.2 of the report, the differences between the 3 p/n's are cable lengths and connector genders.***

***All of these part numbers, along with the LXE antennas, can be found in the LXE document 156602-0001.***

4. FYI - Section 2.2 of RF Safety, MPE distance is not required for LXE handheld is incorrect. MPE distances do not apply to this Proxim transmitter operating in handheld configurations, compliance with SAR limit may be needed.

***Understood. This section is to instruct installers how the MPE distance is determined. It also offers a less technical explanation of why MPE does not apply to handheld equipment. I understand that SAR may apply to this type of equipment but did not find it necessary to include it in this reference.***

5. Please revise last statement in MPE distance estimation section. The radio model number (6430) does not seem appropriate for this transmitter (Proxim 7520) and the minimum separation distance for MPE compliance is 20 cm, not 12.6 cm.

***The MPE distance for all transmitters will be revised to state 20cm unless the calculations show that it should be increased. Revised copy will be uploaded.***

May 21, 2001

6. FYI - Section 3.0 for ETSI Radio and Section 3.2 for RF Safety & ETSI Radios are unrelated to this filing, please do not include unnecessary antennas or unrelated info for filings in the future.

***This document serves multiple purposes. It identifies all antennas that are authorized for use with each of the 4 transmitters given, including those that are authorized for use in Europe. In addition, it informs installers of the proper installation requirements to ensure that RF safety is maintained. I apologize if it contains more information than you need, but we feel that it is a good faith effort to ensure we maintain compliance with various regulations we are obligated to, FCC and others.***

7. The two LXE antennas do not require professional installation, operating and installation instructions should be provided in the operators manual for users to satisfy the 20 cm separation requirement for MPE compliance. Similar installation instructions should be provided to the professional installers for the Cushcraft antennas. Please upload a copy of the revised manual or the relevant pages in the manuals, and confirm similar instructions will be given to the professional installers or upload a copy of the installation instructions for the professional installers. In both cases, the purpose of the separation distance should be stated - for compliance with FCC RF exposure limits.

***The LXE document 156602-0001 previously uploaded will be revised to reflect the 20cm separation requirement. This document was developed exclusively for the purpose identifying approved antennas and their proper installation to ensure MPE requirements are satisfied. This is a document that has never existed at LXE prior to my tenure and we are making every attempt to satisfy all of the requirements we are obligated to. This document serves the purpose of instructing all installers of the MPE requirement of these and the other antennas and is contained in the Bill's of Material of each of the radios identified. A revised copy will be uploaded.***

Sincerely,

R. Sam Wismer  
RF Approvals Engineer  
LXE, Inc.

enc(s).