

October 2, 1998

Chris Byleckie
EC Labs
1249 Birchwood Drive
Sunnyvale, CA 94089

Ref: FCC ID# IMKRL81PC Permissive Change

Dear Mr. Byleckie,

Thank you for forwarding Mr. Dichoso's e-mail dated September 21, 1998. Item #1 asks Proxim to indicate how the device complies with RF safety requirements.

In the original FCC application this same subject was addressed. Proxim's response was to include a warning statement on page 63 of the User's Manual that states:

Warning! It is the responsibility of the installer of this antenna, as well as the user of this product, that this antenna be placed at least 7.5 cm (3 inches) from any person. This is necessary to insure the product is operated in accordance with the RF Guidelines for Human Exposure which have been adopted by the Federal Communications Commission.

The MPE distance was calculated using 446 mW. The calculation is shown below and assumes a 75% maximum duty cycle:

$$\text{MPE Distance} = [(\text{Output Power} * \text{duty cycle} * 10(\text{antenna gain}/10)) / (4 * \pi * \text{Exposure Limit}(\text{mw}/\text{cm}^2))]^{1/2}$$

$$\text{MPE Distance} = [(446 \text{ mW} * 0.75 * 1.26) / (4 * 3.1416 * 0.6)]^{1/2} = 7.5 \text{ cm} = 2.94 \text{ in}$$

I believe Proxim has followed the proper procedure by calculating the MPE distance and putting the warning statement in the manual. Proxim sells this device as a peripheral and cannot guarantee the host device.

Sincerely,

Paul Richards
RF Engineer