



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

May 16, 2003

RE: FCC ID: NI3-IS20V311
Attention: Ellis Wu

I have a few comments on this Application.

1. FYI no action needed – The block diagram is not in compliance with 2.1033. Please note that block diagrams should show the transmit frequency and its path.
2. Please note that this is a PCMCIA card. As such it is by its nature classified as a Portable device. Please note that your rf exposure report classifies this as Mobile. This is not accurate and must be changed. Even though the manual states a 2.5cm separation distance, the device is still portable. Mobile device classification begins when a 20cm separation can be maintained at all times.. Please correct your rf exposure documentation to show the proper exposure designation for this device (i.e. Portable). Please note that since this is a portable device classification, MPE is not an appropriate rf exposure method. Also please note that the device is less than 24mW and as such would not need SAR even when operated within 2.5cm.
3. Please note that the manual uses outdated information on rf compliance. It states that a 2.5cm spacing must be maintained. Please note that since the device is only operating at about 20mW it is under the low threshold level for SAR compliance issues. As such the device can be used within 2.5cm of the body with no rf compliance issues. Please correct item 3 on page 41 of the manual to be in line with the latest rf compliance issues. The rf compliance statement about maintaining a 2.5cm separation needs to be removed and replaced with a simpler (or similar) statement such as "This device meets the FCC RF exposure guidelines when used as instructed."
- 4.

Dennis Ward
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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.