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I have examined the reference design schematic of the Intersil WLAN PC card (13316C), model Gershwin3. This circuit was compared to Samsung's WLAN card, model SWL-1000N as shown in their schematic diagram. I have concluded that the Samsung and Intersil designs are virtually identical, as both are based upon the Intersil Prism I chipset.

It is my opinion that the circuits of both Intersil and Samsung WLAN cards (both the PCMCIA and ISA versions) have no significant differences in those areas which affect Processing Gain, as specified in document CFR 47, Paragraph 15.247(e). It is further my opinion that any processing gain measurement taken on the Intersil card would be applicable to the Samsung card.

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