To: Wouter Blom
wblom@telefication.nl
From: Tim Harrington
tharring@fcc.gov
FCC Equipment Authorization Branch

Re: FCC ID: OSZ38000C

Applicant: Intersil Corporation
Correspondence Number: 6644
731 Confirmation Number: TC949855
Date of Original E-Mail: 01/22/2003

Subject: audit
1) User manual says EIRP<18dBm. EMC report sect. 4.2 - could not determine if this is conducted or radiated. Please submit test setup and procedure info for EMC sect. 4.2, and if that is radiated include raw data with conversion to conducted power.

The user manual has been revised with regards to the output power statement. The EMC report has been revised to clarify the test method for measuring RF output power. The RF output power was measured conducted and directly at the antenna terminal.

2) Please confirm/show whether antennas are present in internal photos.

The exhibit with the interior photographs has been revised. Red arrows now indicate the position of the integral antennas of the device.

3) Please confirm/demonstrate that touch (possible antenna detuning effects) rather than small gap at side position is maximum SAR.

The SAR test report has been revised. Please refer to page 20 of the revised SAR test report.

4) What is expected SAR in notebook computer that does not have audio jacks under PCMCIA slot, i.e., slot bottom at 3-5 mm from notebook bottom?

The SAR test report has been revised. Please refer to page 21 of the revised SAR report attached (table with an assessment of SAR values applying measured SAR values and the 1/r curve of field strength to show SAR values at different positions).

Additional notes:
(1) The card has been retested with a lower RF output power (less than 100 mW). The EMC report and SAR test report have been revised accordingly. The manufacturer will implement the modified RF power output firmware settings, as obtained during the retesting, in their manufacturing process.
(2) The cover letter has been revised in order to indicate that the transmitter is intended for use in a dedicated host only.
(3) The device was retested by CETECOM for RF output power with revised firmware RF output power settings. The RF output power of the device proved to be +19.9 dBm. This is a change of -0.3 dB (-6.7%) in RF output power as compared to the previously measured RF output power of +20.2 dBm. Given the fact that the overall combined measurement uncertainty of the measurement system is +/-13.6%, it was concluded that the difference of -0.3 dB (-6.7%) in RF output power would cause a change in worst-case SAR values which would fall within the measurement uncertainty range of the measurement system which was used during all measurements. It can therefore be justified that the SAR values, as measured at a RF output power of +20.2 dBm, can be represented as being the absolute worst-case values which could be measured at a RF output power of +19.9 dBm.