

From: Will Yauo [willyauo@seed.net.tw]  
Sent: Wednesday, September 04, 2002 8:57 AM  
To: Mike Kuo  
Subject: Re: AmbiCom, Inc., FCC ID:P5T-1100CCF, AN02T2188

Hi Mike,

I study your reply e-mail carefully.

In the FCC reply form RLAFORGE, he mentioned the user must justify the spacing used.  
There is no clear requirement in the content ,the PCMICIA card need to be performed SAR test.  
We have submitted the MPE test report, it is including 2.5cm distance test.

I know most of laptop computers are used on the desk, in very seldom situation; it will be used on the lap.  
Even in this situation, it always can maintain at least 2.5 cm between the antenna of this device and all persons.

We have made an example using the laptop computer put on the lap.

Please see the attachment pictures, it show the distance always maintain at least 2.5cm.

We hope you can accept the warning caution in the user manual.  
It also meet the RLAFORGE e-mail mentioned "the user must justify the spacing used."

If you have any instruction, please advise me.

Thank you very much.  
Best regards,

Will Yauo / ETC

----- Original Message -----

From: Mike Kuo <MikeKuo@CCSEMC.com>  
To: 'Will Yauo' <willyauo@seed.net.tw>  
Sent: Wednesday, September 04, 2002 5:02 AM  
Subject: RE: AmbiCom, Inc., FCC ID:P5T-1100CCF, AN02T2188

> Hi Will:  
>  
> This device was tested in the laptop computer. I have measured the  
> separation distance from the antenna to the bottom of laptop computer from  
> three different laptop manufacturers. None of configuration can provide  
> 2.5cm separation distance. Let me copy one of FCC instructions to TCB in  
> discussing this type of device.  
>  
> I do not believe when this device used in laptop computer, it can provide  
> 2.5cm separation distance so SAR test report is required.  
>  
> Best Regards  
>  
> Mike Kuo

>  
> -----Original Message-----  
> From: TCB [mailto:tcb@tcbcouncil.org]  
> Sent: Thursday, August 22, 2002 6:36 AM  
> To: tcb@tcbcouncil.org  
> Subject: FW: Separation Distance for PCMCIA transceiver with  
> integralantenna  
>  
>  
>  
>  
> -----Original Message-----  
> From: Raymond Laforge [mailto:RLAFORGE@fcc.gov]  
> Sent: Thursday, August 22, 2002 8:15 AM  
> To: tcb@tcbcouncil.org  
> Subject: Re: Separation Distance for PCMCIA transceiver with  
> integralantenna  
>  
>  
> RF exposure evaluation conditions must be as expected in the real world.  
If  
> the situation guarantee > 2.5 cm gap than this can be used. If the  
> situation suggests a gap of < 2.5 cm than this should be used. The FCC  
has  
> seen evidences recently that suggest PCMCIA and other standard cards used  
in  
> laptops may not guarantee >2.5 cm spacing.  
> The user must justify the spacing used.  
> >>> <tcb@tcbcouncil.org> 08/07/02 07:05PM >>>  
> For PCMCIA transceiver with integral antenna to be used in the typical  
> laptop or notebook computer with PCMCIA slots on either side, FCC has  
> determined in the past that this type of device will be considered as  
> portable device. However, FCC has previously determined the separation  
> distance to the body can be at least 2.5cm or in some cases, less than  
> 2.5cm. By actual measurement the separation distance between the antenna  
of  
> PCMCIA card to the bottom of laptop/notebook computer, the separation  
> distance will be least than 2.5cm. What is FCC policy in determine the  
> separation distance for this type of device ?  
>  
> -----Original Message-----  
> From: Will Yauo [mailto:willyauo@seed.net.tw]  
> Sent: Tuesday, September 03, 2002 9:24 AM  
> To: Mike Kuo  
> Subject: Re: AmbiCom, Inc., FCC ID:P5T-1100CCF, AN02T2188  
>  
>  
> Hi Mike,  
>  
> We can understand this requirement.  
> For this product, we consider that it should not belong to portable  
> transmitter.  
> Sometimes, it will be installed into the fixed device house e.g. Desktop  
> Computer.  
> When wireless LAN Card is installed the notebook or laptop computer, it  
> always can maintained at least 2.5 cm between the antenna of this device  
and

> all persons.  
>  
> Anyway, we will ask the manufacturer to add the warning words "Caution" in  
> the user manual.  
> (please see the attachment)  
>  
> If you have any instruction, please advise us.  
> Thank you very much.  
> Best regards,  
>  
> Will Yauo / ETC  
>  
> ----- Original Message -----  
> From: Mike Kuo <MikeKuo@CCSEMC.com>  
> To: Will Yauo (E-mail) <etcemi@seed.net.tw>; Will Yauo-Personal (E-mail)  
> <willyauo@seed.net.tw>  
> Sent: Saturday, August 31, 2002 9:59 AM  
> Subject: FW: AmbiCom, Inc., FCC ID:P5T-1100CCF, AN02T2188  
>  
>  
> >  
> >  
> > -----Original Message-----  
> > From: CERTADM  
> > Sent: Friday, August 30, 2002 6:57 PM  
> > To: 'mkuo@ccsemc.com'  
> > Subject: AmbiCom, Inc., FCC ID:P5T-1100CCF, AN02T2188  
> >  
> >  
> > Notice\_content  
> > -----  
> > Question #1: The highest conducted output power measured in 0.0295W.  
> > Based  
> > upon the new TCB exclusion list ( see attached ), this device will  
> > require  
> > SAR tests to demonstrate RF exposure requirement as Portable device.  
> >  
> > Once this device is used in the laptop computer, normally it can not  
> > maintain 2.5cm from the end user when the laptop computer is placed on  
> > the  
> > lap. Based upon the separation distance is less than 2.5cm, the low  
> > threshold for not requiring SAR is  $60/2.437=24.62\text{mW}$ . The reported  
> > output  
> > power ( 29.5mW ) is over the 24.62mW so SAR test is required.  
> >  
> > If this device can demonstrate that this device can maintain 2.5cm  
> > during  
> > the normal usage, please provide such information.  
> >  
> > Best Regards  
> >  
> > Mike Kuo/ Compliance Certification Services  
> > The items indicated above must be submitted before processing can  
> > continue  
> > on the above referenced application. Failure to provide the requested  
> > information within 60 days of the original e-mail date may result in  
> > application dismissal and forfeiture of the filing fee. 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 e-mail address listed below the name of the sender.

> >

> >