



American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

August 29, 2002

RE: TeLLUS Group

FCC ID: PB6-02012

I have a few comments on this Application.

- 1.) The FCC has adjusted some of its interpretations of PCMCIA cards when used in laptop computers. Current thinking requires a TCB to consider the final usage of the device and how it may be operated by typical end users. This device consists of a PCMCIA card with a measured Pout of 24mW connected to either an integral antenna on the nose of the PCMCIA card, or to an external antenna mounted on the nose and connected directly via a reverse threaded SMA connection. My concern is with the external antenna showing a reported gain of +2dBi. The FCC has set a threshold limit of 60mW/f(GHz) radiated or conducted power for all transmitters which are capable of body contact during normal operations. Any approval above this threshold can still be performed by a TCB; however it is required the Applicant supply SAR test data before any Grant of Equipment Authorization is issued. If you need help in locating an appropriate test facility please let us know. I am also attaching for your reference a copy of the new TCB Exclusion List which became effective July 17 of this year. Again, if you have questions on this document I will be happy to assist you. In addition, and until this issue has been resolved, no further processing of your Application will proceed. We must resolve these RF Exposure considerations.

Regards,

William H. Graff
President and Examining Engineer

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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.