



September 15, 2004

RE: Intel Corporation

FCC ID: PD9FJ3B2915ABG

[Answers to the ATCB comments on the above referenced Application.](#)

1) The channel attestation provided appears to list the incorrect FCC ID number. Please verify the model number information as well.

[Please refer to "PD9FJ3B2915ABG Channel Attestation.pdf" exhibit.](#) The model names are correct. The only change is the FCC ID.

2) Power listed on page 12 of the theory of operation suggests higher power than measured. Please explain if this page is the intended TX power or not. Note that the FCC expects the device to be TX at the highest output power possible.

[Please refer to "Theory of Operation - WM3B2915ABG \(Revised\).pdf" exhibit.](#) The power levels were revised.

3) Please note that the FCC no longer desires that the safe distance for mobile devices be calculated in the RF exposure exhibit if the safe distance is < 20 cm, but instead prefers the power density results to be calculated at 20 cm and compared to the power density limit.

[Please refer to "MPE Calculations \(Rev. A, 09-16-04\).doc" exhibit.](#)

4) Regarding the MPE calculations, it appears that the maximum gain for Pumpkin antenna in the 2.4 GHz band is actually 2.31 dBi, not 2.65 dBi. Please review and correct if necessary.

[Please refer to "MPE Calculations \(Rev. A, 09-16-04\).doc" exhibit.](#)

5) Regarding the MPE calculations, it appears that the maximum gain for Pumpkin antenna in the 5 GHz band is actually 2.95 dBi, not 2.65 dBi. Please review and correct if necessary.

[Please refer to "MPE Calculations \(Rev. A, 09-16-04\).doc" exhibit.](#)

6) Photographs of the antennas provided in the antenna information appear to be much different in size/shape than the test photographs. Please explain.

[Please refer to "Photographs - Test Setup \(Rev. A, 09-16-04\).doc" exhibit.](#) The antennas are mounted on the upper corners on the LCD screens.

7) Gains in the test report for the Mint and Pumpkin antenna do not appear to match the antenna information provided.

[Please refer to test report revisions.](#) Page 8 of the DTS report and page 7 of the UNII report.

8) Limits on page 33 & 34 of the DTS test report do not appear correct (60 and 80 dBuV/m). These limits also appear many times elsewhere in the DTS report and throughout the UNII report but is uncertain what these are. Please explain the derivation of these and/or correct as necessary.

[These limits are from Table 3 in RSS-210 for the receiver mode of operation of the EUT.](#)

9) Please explain the derivation of the 68 dBuV/m limits on pages 31 & 32 of the DTS report. Note this is duplicated throughout the report. This appears to be the limit is for the -27 dBm UNII limit, although this is a DTS report. Please explain.

[That was a mistake. The limit should have been -20dB below the carrier frequency. Please refer to test report revisions.](#)