

## Briggs, Mark

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**From:** Yu, Caroline <caroline@qca.qualcomm.com>  
**Sent:** Tuesday, April 09, 2013 2:34 PM  
**To:** Briggs, Mark; Hoque, Claire; Chu, Tina  
**Cc:** Kuwatani, Soledad U.; Aumentado, Ana M.; Hank\_Liu@DELL.com; An\_L@pegatroncorp.com; AlexAnder@sporton.com.tw  
**Subject:** RE: URGENT AN13T0208 (C2PC with SAR) Qualcomm Atheros 13U14858/AN13T0208, defer date is 4/9

Dear Mark

- 1) This is a composite device with grants for DSS, DTS, NII, JBP and DXT (60GHz). The filing needs to explain which of these grants are affected and which are not, and provide justification.
  - The C2PC letter does not explain why there is no data/reports to cover the 60GHz or JBP operation  
***[Caroline:] In the host manual, on page 18, Note indicates: WiGig (802.11ad) is only enabled when your computer is properly docked on the powered stand and with power. WiGig will be disabled when your computer is not docked. As such, 60G operates in mobile category. There is no change with the product for its certified condition except for the WLAN close distance (compliance show by the submitted SAR test report). DXT and JBP operations are not affected by the proposed change and not subject to C2PC.***
  - There is nothing to justify why the original EMC reports for DSS, DTS, NII and DXT (60GHz) equipment codes are representative. Suitable justification would be that the antennas are unchanged or are of the same type and equal or lower gain. Including the original antenna types and gain and new antenna types and gain in the cover letter (or in a separate letter) will help speed up our review and avoid having to go back and cross reference the original filing.  
***[Caroline:] Please find attached antenna datasheet, showing PIFA type antenna of lower than tested antenna gains in all bands. Radiated spurious emissions are covered by the original filing.***
  - I see there is some information in the antenna description justifying no portable rf exposure for the 60GHz device (confidential document). Some words about how the device “knows” it is in the docking stand, and confirmation that there are no accessories that would make the device think it is docked in the stand when being used as a tablet, would be helpful.  
***[Caroline:] This will be addressed by the host system manufacturer.***
  - No maximum power information for NII/DTS/DSS to justify the values used in the SAR report for scaling of power and justification for exemption from SAR.  
***[Caroline:] Production power is always below max certified power. So we use the max certified power for scaling purposes.***

Caroline Yu

Qualcomm Atheros, Inc.  
1700 Technology Dr.  
San Jose, CA 95110, USA  
**Office: +1 (408) 652-1210**  
Cell: +1 (408) 368 9046

