

Safety & Compliance Consulting
29 Sweetman Lane
West Milford, NJ 07480-2932
Tel/Fax (973) 728-5141

September 7, 2001
QTK2001-F003B

Federal Communications Commission
Office Engineering and Technology
7435 Oakland Mills Road
Columbia, MD. 21046

Attn.: Richard Fabina, Chief / Equipment Authorization Branch
Subject: Request for Interpretation of Rules to FCC Public Notice DA 00-1407 for Modular Transmitter
TCB Certification of Part 15.247 DSSS Modular Transmitter / 2.4 GHz WLAN PC Card Module

Dear Mr. Fabina:

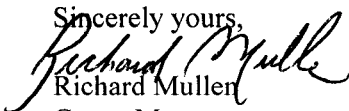
Please be advised, my client wants to submit their 2.4 GHz WLAN PC Card Module for equipment authorization through TCB. Further, it is our belief this composite device can be issued Certification by TCB as Modular Transmitter in accordance with the eight (8) conditions described within FCC Public Notice DA 00-1407 released on June 26, 2000.

This device is a WLAN PC Card Module type device, which gets inserted and/or installed within any host mobile end-product device (i.e. type device that assures minimum 20 cm spacing between dual antennas and user). Also, this composite device consists of: (1) transmitter which uses direct sequence spread spectrum modulation subject to Certification with FCC ID; (2) receiver subject to Verification; and (3) computer peripheral device subject to DoC with FCC logo. The transmitter portion of this device is compatible with IEEE 802.11b standard as 11-Channel WLAN Card Module, which operates within 2412~2462 MHz with maximum 10.35 mW RF conducted output power. This module is always provided with exact dual antennas with 1.6 dBi antenna gain, exact cable length with 2 bonded ferrite cores, unique connectors and installation instructions. The provided dual antennas do not transmit at same time, but rather provided function diversity. This PC Card Module and its external dual antennas were tested as a standalone device (i.e. while located outside host mobile end-product) to demonstrate compliance without reliance upon an unknown mobile end-product enclosure.

Refer to the attached User Manual with RF exposure warning that advises user must maintain at least 20 cm spacing between the antenna and user to satisfy RF exposure requirements; and FCC ID labels for both the module and the end product, which will house the module.

Should you have any questions or comments, please contact the undersigned. Thank you for your attention and cooperation in this matter.

Sincerely yours,



Richard Muller
Group Manager
Safety & Compliance Consulting
Mullenr@optonline.net

QTK2001-F003A / TIMCO-864T1
W-Link 2.4 GHz DSSS WLAN Card Module
FCC ID: PSS-WEN-2012

Subject: W-Link 2.4 GHz DSSS WLAN PC Card Module Under FCC ID: PSL-WEN-2012

The subject device complies with modular transmitter requirements as defined in FCC Public Notice DA 00-1407 released on June 26, 2000. This includes compliance with consideration items (a)~(e) and all eight (8) conditions.

1. This modular transmitter is provided with RF shielding.
2. This modular transmitter is provided with buffered modulation/data inputs.
3. This modular transmitter is provided with power supply regulation.
4. This modular transmitter complies with the antenna requirements of Section 15.203 and 15.204(c). This modular transmitter is always marketed with exact known dual antennas. The dual antennas have 1.6 dBi antenna gain, exact cable length with 2 bonded ferrite cores and unique connectors. The dual antennas do not transmit at same time, but rather provided function diversity.
5. This modular transmitter with its exact known dual antennas were radiated and conducted tested as a standalone device (i.e. while located outside host mobile end-product) to demonstrate compliance without reliance upon unknown mobile end-product enclosure.
6. This modular transmitter will have its own unique FCC ID label; and the mobile end-product device will include the following type wording within its own label marking:
Contains W-Link WLAN PC Module TX FCC ID: PSL-WEN-2012
Also, the mobile end-product User Manual will provide RF exposure warning that advises user must maintain at least 20 cm spacing between dual antennas and user to satisfy FCC RF exposure requirements.
7. This modular transmitter complies with any specific rule or operating requirements applicable to the transmitter and the manufacturer will provide adequate instructions along with the module to explain any such requirements.
8. This modular transmitter complies with applicable RF exposure requirements. Its maximum RF conducted output is 10.35 mW and the User Manual gives advise to maintain 20 cm spacing between dual antenna and user.