

American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

November 22, 2002

RE: FCC ID: PU5MPCI3A-20R

Attention: Daphne Liu

I have a few comments on this Application.

- 1 Please separate the internal and external photos into separate file folders. xxx
- It is not clearly identified as to what the EUT is. In one place it is indicated that the LAN card module is the device, yet in the manual it also states that this card is a LMA (limited modular approval) and that the host is a very specific device (Built in acer Notebook PC MS2101). Please note if granted, this device will necessarily be a LMA for the specific host tested in the test report. Please also note that grant notes will restrict this LMA to use in only this host device. As such, it must be installed by the OEM and the FCC ID of the LMA must appear on the outside to the host unit. Clear instruction to this affect must be provided to the OEM. Please provide evidence of these instructions. xxx
- 3 Please provide a separate exhibit of the test setup photos. This is a requirement of the FCC. xxx
- 4 You have not shown the circuitry under the shield of the card. This is a requirement. Please provide clear photos of the circuitry under the rf shield on the mini PCI card. xxx
- Please note that the conducted power from this device is 44mW. One of the antennae for this device fits into the bottom of the LCD screen and appears to be possibly within 2.5cm but no greater than 5cm of the body. The device is therefore classified as portable and MPE does not apply. Please remove MPE information from your report. Please note that under the conditions previously mentioned SAR is required. Please provide the necessary SAR report for this device in the specified host. Alternately, please provide proof that the antenna(s) of this device are placed no closer than 5cm form the body. xxx lower antenna never transmits
- Please note that the label information provided in your application document "Ruby_App form.doc) does not agree with the label sample. Please correct the label sample to show what the actual label is to look like. xxx
- Please note that you have provided no letter requesting confidentiality for this application. All documents will be open for public view including the schematics. If you desire confidentiality on the schematics, block diagram and technical description, you must so request under 47 CFR 0.459 xxx no confidentiality
- The first table on page 13 of the report is confusing. It is not clear if the number on the second line is part of the frequency. Please put your table fields in a manner that is easily distinguishable (i.e. data on one line). You can do this by expanding the table field to accommodate the entire number. xxx
- You have not provided the span used in PPSD measurements. Please specify what the span used in the test was. This is important because the sweep time must be calculated from that span. Alternately, please provide a plot of the PPSD measurement. xxx
- Please note, on page 24 of the report you state that between 3- to 1000MHz "the reading are recorded with peak detector and/or average detector and with the 1 MHz bandwidth." This is incorrect. Below 1000MHz limits are QP not averaged. Please correct your report to be consistent with the requirements of Part 15.247. Also, please address the measurements above 1000MHz in your procedure. xxx
- Please note that the test report date of test states November 11, 2002. Please note the calibration list on page 26 shows equipment used during testing as out of calibration. Please retest the device using calibrated measurement equipment. xxx

Dennis Ward

• Page 2 November 22, 2002

Dennis Ward mailto:dward@AmericanTCB.com

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.