



American Telecommunications Certification Body Inc.  
6731 Whittier Ave, McLean, VA 22101

December 13, 2002

RE: Netgear, Inc.

FCC ID: PY3MA401RD

I have an immediate comment on this Application before I can begin.

This transmitter is a PCMCIA card with integral antenna for unrestricted use across a wide variety of host devices. The rated RF power output as quoted on Form 731 is 63 milliwatts and, when combined with the maximum expected antenna gain gives maximum EIRP of nearly 100mW.

Please review the TCB Exclusion List of July 17, 2002 attached separately to this email. You will see that there are two low threshold values for RF Exposure, above which SAR testing is required: 120mW/f(GHz) for devices which can maintain 2.5cm from the body, and 60mW/f(GHz) for devices which can come in contact with the body. PCMCIA cards are considered, under current FCC interpretation, a member of the second more severe group. It is no longer possible to approve PCMCIA cards using the RF category "Mobile" classification; they must have a SAR evaluation.

Please submit a SAR report at your first opportunity. No further action on this Application will proceed until this is submitted. We will help you in every way possible as you seek a solution to this problem.

If you have any further questions, please do not hesitate to ask.

Regards,

William H. Graff  
President and Examining Engineer

[mailto: whgraff@AmericanTCB.com](mailto:whgraff@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.