

**Chris Harvey**

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**From:** M<sup>a</sup> Gema Briseño Pascual [gbriseno@cetecom.es]  
**Sent:** Friday, August 06, 2004 8:09 AM  
**To:** Chris Harvey  
**Cc:** Marianne Bosley; Alvin Ilarina; Ricardo Orejas Rodríguez  
**Subject:** RE: Additional Information needed for BlueGiga FCC ID: QOQWRAP229X MT#15962

Hello Chris,

Answers to your questions ...

1.- Internal photographs of both sides of the Bluetooth Module: you have them already. They are in the docs submitted for the FCC certification of the BT module. They are kept in the photos folder. Please have a look to the CD I sent to you.

2.- Yes, we confirmed that the Radiated EIRP measurement of 19.43dBm was performed with an Access Server containing 4 Bluetooth transmitters operating with the hopping turned off and all transmitters transmitting at the same frequency.

5.- yes, you are correct. The Bluetooth module inside the Bluetooth Access Server is the one being approved in application for FCC ID: QOQWRAP2022-1-B2B. Therefore, attached is the cover letter requested and the amended confidentiality letter.

7.- Yes, we confirmed that this devices operation will not violate the non-coordination requirements of 15.247(h).

Items 3, 4 and 6 still open. Waiting for response from the FCC.

Regards,  
Gema.

-----Mensaje original-----

**De:** Chris Harvey [mailto:Chrisarveyemc@comcast.net]

**Enviado el:** viernes, 06 de agosto de 2004 3:07

**Para:** M<sup>a</sup> Gema Briseño Pascual

**CC:** Marianne Bosley; Alvin Ilarina

**Asunto:** RE: Additional Information needed for BlueGiga FCC ID: QOQWRAP229X MT#15962

(resent with correction of MT#)

Gema, I have been reviewing the above referenced application for the Access Server and have the following items/issues that need to be addressed in order to continue this review:

- 1) The internal photographs show only the assembled unit with 4 Bluetooth modules installed. Please provide photographs of both sides of the main board of the Access Server and both sides of a Bluetooth Module.
- 2) Please confirm that the Radiated EIRP measurement of 19.43dBm was performed with an Access Server containing 4 Bluetooth transmitters operating with the hopping turned off and all transmitters transmitting at the same frequency (not typical but is worst case).
- 3) The product description seems to imply that this device is configurable with multiple transmitters, including WLAN and GPRS modems. This Grant will be conditioned such that only the 4 Bluetooth Transmitters are co-located, and that other transmitters are not to be co-located with this device, including any GPRS or WLAN devices. I am posing the RF Exposure co-location question to [labhelp@fcc.gov](mailto:labhelp@fcc.gov) as follows:  
I have a customer who wishes to get approval on an access server, deemed to be a mobile device that

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has 20 cm or greater separation. This device comes with 4 Bluetooth modules installed and also contains a Compact Flash slot for users installation of available compact flash GPRS or WLAN cards. This device will not be provided with the WLAN or GPRS cards, but the slot is intended to be used for this purpose. I am trying to determine the best way to address the RF Exposure issues for the co-located user environment. Since this is a mobile device, could the MPE limit be calculated for the worst case co-located situation and then the User is informed to only install cards that have a power below a certain maximum power?

4) The MPE exhibit submitted only addresses the Bluetooth modules installed and not the recommended co-located transmitters (WLAN or GPRS). Depending on the FCC [labhelp@fcc.gov](mailto:labhelp@fcc.gov) response I may need to request modification of the MPE exhibit.

5) The test report submitted for this application only contains the Radiated Emissions testing. I have assumed that the Bluetooth Module installed in this device is the one being approved in application for FCC ID: QOQWRAP2022-1-B2B. I need a cover letter that indicates to use the RF test report and the specific technical documentation, such as the schematics, from that specific FCC ID number. Please be sure to amend the Confidentiality letter if these additional documents need to be held confidential.

6) This device is classified as mobile, operating at a 20 cm or greater separation from persons. The Users must be informed of the requirement to operate this device with a minimum of 20cm separation. Additionally, I am getting clarification as the RF Exposure requirements for this device when it is configured with a WLAN or GPRS card as recommended in the manual. There may be additional requirements upon receipt of a response from the FCC.

7) Please confirm that since this device will incorporate up to 4 Bluetooth transmitters that this devices operation will not violate the non-coordination requirements of 15.247(h).

Please contact me if you have any questions. Additionally I will be traveling all next week and would request that you copy Marianne on all communications, just in case I am not able to address the response in a timely manner.

Best regards,

Chris Harvey