

1) FYI SAR test for keyboard-up position typically not needed for this device type, also tilt of laptop typically not needed

Response 1): This has been noted.

2) Please submit plot(s) for dipole system verification. If verification was done in body liquid, include justification for body dipole target values.

Response 2): The plots are have been added to the update test report on page 8. Verification was done in head tissue, as the validation parameters in P1528 are given for head tissue.

3) Please submit portions of probe cal. cert. that show cal. factors.

Response 3) Uploaded as attachment SN0132cal.pdf

4) Form731 has 72mW. Do you have source-based time-averaged output power data?

Response 4) We have investigated what duty factor is useful to consider when assessing source-based time-averaged power. Although actual duty cycles at full data rate range from 63% to 93%, the user never will be confronted with a higher duty cycle than 93%. For SAR tests we therefore are in favor of using 100% duty cycle. Average Power (using a HP 8481A power sensor) has been measured to be 33.9 mW (with the transmitter transmitting 100% duty cycle. If we would take into account the maximum duty cycle of 93%, this power becomes 31.5 mW.

5) Please confirm whether first two measured points along phantom surface normal in zoom scan were within 10mm of surface.

Response 5) We confirm this.

6) Appears that SAR for lap held position was tested with card in upper of two slots with card-to-phantom spacing of 25mm. How are these results applicable to use of card in typical modern laptops where spacing is 3-15mm?

Depending on response to #4, re-test at closer spacing may be appropriate.

Response 6) We understand your question and confirm that the spacing of 25 mm is not applicable to typical modern laptops. As an alternative to retest, please consider configuration key board up. This position is a position with the base of the laptop pressed against the phantom, and with the laptop tilted such that the card touches the phantom. This position was intended to reflect lap held position. The caption of the photo in 6.1.2. should read

“The position of the dots show the area where the body of the host lap top PC and the EUT do touch the phantom shell. The EUT has been positioned in the LOWER slot position, to reflect the worst case.”

(the author of the report wrote upper because it is the upper slot when you turn the laptop upside down.)

We believe that this position is even worse than the requested position (horizontally against the phantom, both a spacing of 3-15 mm). Please consider this position as the position to show SAR limit compliance for lap held position.

7) Please submit side view photo of card in laptop.

Response 7: Side view is shown in photo