

To: Stan Lyles
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FCC Application Processing Branch

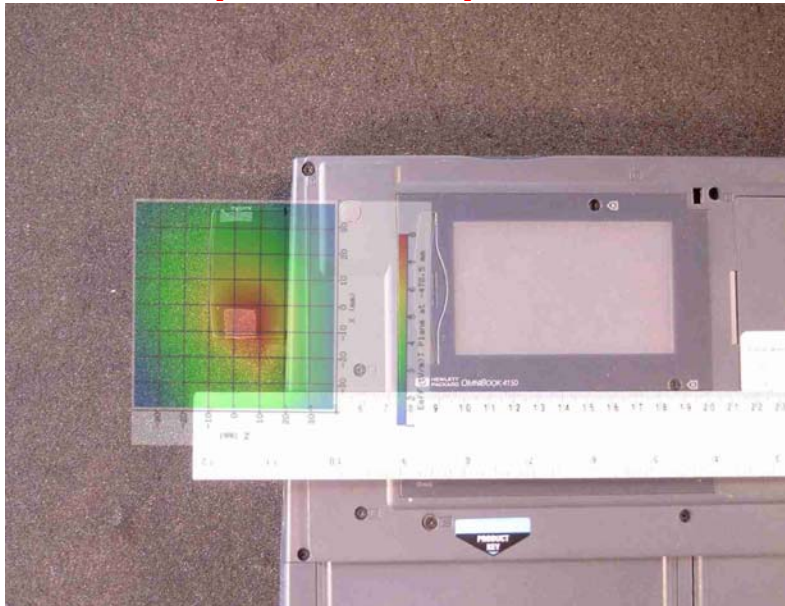
From: Jaap Schuurmans TNO EPS BV

Re: FCC ID RGS39200CB
Applicant: Conexant Systems B.V.
Correspondence Reference Number: 26757
731 Confirmation Number: EA535003

Dear Mr Lyles, please find my answers to your questions related to the filing referenced above below.

- 1) Please provide SAR contour plots that cover the entire device (card).

Answer 1) Please find requested contour plot below:



- 2) Please discuss reasons for the large difference in SAR values seen for the 5.7 GHz testing 6 Mbit rate configuration between the two reports on file.

From the power measurements on the device, one can observe a minimum around 5700 MHz in power measured on the device. Note that the conducted powers are corrected with a fixed, worst case antenna gain.

In addition to this, the antenna also appears to have a minimum gain around 5700 MHz, see table below, which are data obtained from the applicant. All this may explain lower value measured at 5700 MHz.

Antenna	Total Average Gain [dBi]								
	2400	2450	2500	4850	5050	5250	5450	5650	5850
Antenna (1)	-2.2	-1.8	-1.7	-1.4	-2.0	-2.0	-1.8	-2.4	-1.7
Antenna (2)	-2.4	-2.2	-2.0	-1.0	-1.8	-1.5	-1.4	-1.8	-1.3
Antenna (1)+(2)	-0.9	-0.4	-0.2	0.4	-0.4	-0.1	0.2	-0.2	0.2

3) Please justify use of a single host. Current EAB policy requires 3 host testing for source based time averaged powers greater than 50 mW at 5 GHz.
Provide additional SAR results at 5 GHz as appropriate.

Answer 3) In both SAR reports the average conducted power has been reported, when applicable corrected with antenna gain. See SAR reports page 10 (5500 MHz TNO EPS report) and page 23 (Ultratech Labs report). We did not find values above 17 dBm (50mW) and we concluded single host testing was appropriate. As for source based time average: The transmitter is set to transmit continuously, whereas in normal user operation duty cycles higher than 93% will not occur as per the IEEE 802.11 standard.