

# TNO Electronic Products & Services (EPS) B.V.

Nederlandse Organisatie voor  
toegepast-natuurwetenschappelijk  
onderzoek / Netherlands Organisation  
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Dear Mr./Ms.,

On behalf of our customer Conaexant B.V., we hereby would like to apply for FCC certification (limited modular approval, see also excerpt of DA 00-1407 and remarks below) of the following device:

FCC ID : RGS39200MB  
Brand : Conaexant  
Model number : ISL39200M  
Description : 2.4/5 GHz IEEE 802.11g/a WLAN MiniPCI card

The usage of this transmitter will be limited to the following specific host (notebook PC):  
brand: IBM, model: R40.

The following PDF files (exhibits) are electronically submitted:

1. Cover letter containing the request for FCC certification
2. Request for confidentiality
3. Test report(s).
  - a) Test report in conformity with Part 15.247, 2400 - 2462 MHz
  - b) Test report in conformity with Part 15.247, 5725 - 5850 MHz
  - c) Test report in conformity with Part 15.407, 5150 - 5250 MHz
  - d) Test report in conformity with Part 15.407, 5250 - 5350 MHz
  - e) Test report in conformity with Part 15.407, 5470 - 5725 MHz
4. Bill of materials
5. Circuit diagram
6. Block diagram
7. Operational description
8. Interior photographs
9. Exterior photographs
10. Test setup photographs
11. RF exposure statement
  - a. SAR Test report covering 2400-2462 MHz, 5150-5350 MHz and 5725-5850 MHz
  - b. SAR Test report covering 5470-5725 MHz
12. Authorization letter
13. User manual
14. Label information
15. Antenna information

Best regards,  
TNO Electronic Products & Services (EPS) B.V.

J. Schuurmans, B.Sc.E.E.  
Senior Engineer EMC/Telecom

**Subject**  
Cover letter

**Date**  
March 19, 2004

**Our reference**  
04k0258

**Your reference**  
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Our General Terms and Conditions, as filed at the Chamber of Commerce in Groningen, are applicable to all orders given to TNO Electronic Products & Services (EPS) B.V.

TNO Electronic Products & Services (EPS) B.V. is registered at the Chamber of Commerce in Groningen with no. 27247331.



**Excerpt of DA 00-1407**

**Date**  
March 19, 2004

In order to obtain a modular transmitter approval, a cover letter requesting modular approval must be submitted and the numbered requirements identified below must be addressed in the application for equipment authorization.

**Our reference**  
03K0809a1

**Your reference**  
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1. The modular transmitter must have its own RF shielding. This is intended to ensure that the module does not have to rely upon the shielding provided by the device into which it is installed in order for all modular transmitter emissions to comply with Part 15 limits. It is also intended to prevent coupling between the RF circuitry of the module and any wires or circuits in the device into which the module is installed. Such coupling may result in non-compliant operation.

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**Remark: The transmitter has its own RF shielding.**

2. The modular transmitter must have buffered modulation/data inputs (if such inputs are provided) to ensure that the module will comply with Part 15 requirements under conditions of excessive data rates or over-modulation.

**Remark: The transmitter has buffered modulation/data inputs.**

3. The modular transmitter must have its own power supply regulation. This is intended to ensure that the module will comply with Part 15 requirements regardless of the design of the power supplying circuitry in the device into which the module is installed.

**Remark: The transmitter has its own integrated and dedicated power supply regulation.**

4. The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c). The antenna must either be permanently attached or employ a “unique” antenna coupler (at all connections between the module and the antenna, including the cable). Any antenna used with the module must be approved with the module, either at the time of initial authorization or through a Class II permissive change. The “professional installation” provision of Section 15.203 may not be applied to modules.

**Remark: The transmitter has a “unique” antenna coupler. Details about the antenna is described in the exhibits**

5. The modular transmitter must be tested in a stand-alone configuration, i.e., the module must not be inside another device during testing. This is intended to demonstrate that the module is capable of complying with Part 15 emission limits regardless of the device into which it is eventually installed. Unless the transmitter module will be battery powered, it must comply with the AC line conducted requirements found in Section 15.207. AC or DC power lines and data input/output lines connected to the module must not contain ferrites, unless they will be marketed with the module (see Section 15.27(a)). The length of these lines shall be length typical of actual use or, if that length is unknown, at least 10 centimeters to insure that there is no coupling between the case of the module and supporting equipment. Any accessories, peripherals, or support equipment connected to the module during testing shall be unmodified or commercially available (see Section 15.31(i)).



**Remark: The transmitter has NOT been tested in a stand-alone configuration in order to demonstrate that the module is capable of complying with Part 15 emission limits regardless of the device into which it is eventually installed. The transmitter is only intended for use in the configuration as described in the filing. Other configurations may require additional testing and certification by the FCC.**

**Date**  
March 19, 2004

**Our reference**  
03K0809a1

**Your reference**  
-

6. The modular transmitter must be labeled with its own FCC ID number, and, if the FCC ID is not visible when the module is installed inside another device, then the outside of the device into which the module is installed must also display a label referring to the enclosed module. This exterior label can use wording such as the following: "Contains Transmitter Module FCC ID: XYZMODEL1" or "Contains FCC ID: XYZMODEL1." Any similar wording that expresses the same meaning may be used. The Grantee may either provide such a label, an example of which must be included in the application for equipment authorization, or, must provide adequate instructions along with the module which explain this requirement. In the latter case, a copy of these instructions must be included in the application for equipment authorization.

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**Remark: The transmitter is labeled with the FCC ID number. The device in which the transmitter is installed will display the label as described in the filing.**

6. The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacturer must provide adequate instructions along with the module to explain any such requirements. A copy of these instructions must be included in the application for equipment authorization. For example, there are very strict operational and timing requirements that must be met before a transmitter is authorized for operation under Section 15.231. For instance, data transmission is prohibited, except for operation under Section 15.231(e), in which case there are separate field strength level and timing requirements. Compliance with these requirements must be assured.

**Remark: Not applicable.**

8. The modular transmitter must comply with any applicable RF exposure requirements. For example, FCC Rules in Sections 2.1091, 2.1093 and specific Sections of Part 15, including 15.319(i), 15.407(f), 15.253(f) and 15.255(g), require that Unlicensed PCS, UNII and millimeter wave devices perform routine environmental evaluation for RF Exposure to demonstrate compliance. In addition, spread spectrum transmitters operating under Section 15.247 are required to address RF Exposure compliance in accordance with Section 15.247(b)(5). Modular transmitters approved under other Sections of Part 15, when necessary, may also need to address certain RF Exposure concerns, typically by providing specific installation and operating instructions for users, installers and other interested parties to ensure compliance.

**Remark: The application of this transmitter is limited to the configuration as described in the filing. A RF exposure statement is part of the exhibits in order to prove compliance of this specific configuration with 47 CFR Part 15.247 (b)(5) and 47 CFR Part 15.407 (f). Other configurations may require additional testing and certification by the FCC.**