To: Andy Leimer
Andrew.Leimer@fcc.gov
FCC Application Processing Branch

From: Jaap Schuurmans, TNO Electronic Products & Services (EPS) B.V.
schuurmans@eps.tno.nl

Re: FCC ID **RGS39200MB**
Applicant: Conexant Systems B.V.
Correspondence Reference Number: **26738**
731 Confirmation Number: **EA611537**

Dear mr. Leimer, please find attached answers to question raised in the filing referenced above

1) Modular request cover letter states:
"The device in which the transmitter is installed will display the label as described in the filing." Host product labeling info not found in filing - please clarify or revise filing.

Answer 1) The Host Product Labelling information has been uploaded as part of an updated label information exhibit.

2) Please submit antenna photos and location info either:
a) external photos of host product with correct callouts/pointers to exact antenna location(s) and size(s), AND photo of bare un-installed antenna(s), or
1) internal photos of host product showing antenna(s) as installed

Answer 2) The requested information has been uploaded.

3) 2.4/5.2/5.8ghz SAR report shows system verification data only for 5.8ghz Oct23. However, device test plots show Nov4 for 5ghz and Oct6 for 2.4ghz. Per Supplement C system verification is requested for each day of device testing. Please submit 2.4ghz verification plot(s), and justify or resubmit 5.8ghz validation for correct date.

Answer 3) At the time of testing we were testing alternative and improved system validation routines, so earlier dates were confused from the actual date. The date of the system validation has been corrected in the revised test report. The 2.45 verification plots have been added to the revised test report

4) SAR results exceeding 1.6 W/kg, even for non-intended use positions, cannot remain on file at FCC. Please revise 2.4/5.2/5.8ghz and 5.5ghz SAR reports accordingly.

Answer 4) The test reports have been revised.

5) 5.5ghz SAR pg 16 refers to Compaq M700, but filing is for LMA in IBM - please explain or revise.

Answer 5) This typing error has been corrected to reflect the right host i.e. IBM R40

6) 5.5ghz SAR pg 17 refers to Cardbus card, but filing is for miniPCI - please explain or revise.

Answer 6) The Cardbus Card reference was erroneous. The report is revised.

7) 5.8ghz SAR report uses Bristol liquid for head but not body. Please confirm 5.5ghz report uses Bristol liquid for both head and body. Why the difference?

Answer 7) We confirm that for 5.5 GHz report Bristol liquids were used for both head and body liquid. At the time of testing the 5.8 GHz channels, 5.8 body liquid was not available to us. We got 5.8 body liquid in december 2003. Hence, 5.5 GHz, which was tested in 2004, has been tested with Bristol liquids.

8) In this 5.5ghz SAR report and in future filings please include date of test on device and system verification SAR plots.

Answer 8) The dates have been added and updated in the revised report(s)

9) In this 5.5ghz SAR report and in future filings please include probe conversion factors on device and system verification SAR plots.

Answer 9) The entire probe calibration document is annexed to the SAR reports. See also answer 10)

10) How were 5.47-5.7ghz SAR probe conversion factors obtained, and what are numeric values?

Answer 10) The probe conversion factors are obtained as described in the SAR report, section "Immersible SAR probe calibration report IXP – 050 S/N 0131" (added to the test report). The numerical values are: 0.435 @ 5800 MHz for brain tissue and 0.750 for body tissue @ 5800 MHz