



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

September 16, 2007

RE: ATCB005418

FCC ID: T58NW3332007M1

I have a few comments on this application. Depending on your responses, kindly understand there may be additional comments.

1. The antenna of this device would be less than 20cm from body when the notebook computer with this device is operating in a position touched to the body,
For a portable device (<20cm), it is required to check if the SAR testing is needed.
When the output power of this device is less than low threshold, the SAR testing is not required --otherwise you have to perform the SAR testing for this device.
Attached please find the formula from FCC on how to calculate the value of low threshold which is based on the formula $(120/f\text{GHz}) \text{ mW}$, $d \geq 2.5 \text{ cm}$.
The output power used in the formula is a time-averaged RMS power, not a peak power.
Time-averaged RMS power is always less than peak power.

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.