

June 14, 2008

Dear Mr. Uganzenwoko,

Please be advised this job in question involves using pre-approved (with FCC ID) modules. This includes the use of FCC Modular Approved Circuit Boards installed into a Tablet PC.

Two of the FCC Modular approved Circuit Cards in question, namely the WLAN and the Bluetooth, were now going to be used in a simultaneously operated mode. A Class II change would be necessary. Therefore, the applicant contacted Timco Engineering to perform testing on these two pre-approved FCC Modular Approved devices for both EMC Simultaneous Transmission performance and SAR Compliance. Celltech Incorporated was contacted to perform SAR Testing. The results for both EMC and SAR compliance were well within the FCC Guidelines and Rules. This data was reviewed and a Class II Change for Grant of Certification was approved for these Modular Approved Circuit Cards. This job was to determine if simultaneous transmissions between the WLAN and Bluetooth modules were within the FCC limits for EMC and SAR compliance rules.

The question you are asking Timco Engineering does not appear to address the above devices. The document regarding: [www.fcc.gov/oet/ea/presentations/files/oct07/Oct\\_07-DFS\\_Update\\_Final-AL.pdf](http://www.fcc.gov/oet/ea/presentations/files/oct07/Oct_07-DFS_Update_Final-AL.pdf) was answered by the applicant regarding FCC compliance. A Grant of Certification was previously issued for this device. A "Change In ID" was submitted. The original Grants for Modular Approval were issued by American TCB for Intel. Timco Engineering reviewed the Change In ID application and after review, the Tablet PC appeared to meet the rules for EMC and SAR requirements including the above. Those original Test Reports are available on the FCC Web site under FCC ID: PD9WW3945ABG.

Based on what was required to approve Simultaneous Transmission testing by Timco Engineering, the EMC Test Report and the SAR Compliance Test Report were submitted for this application. Later, a question regarding SAR Testing was answered and appeared to be satisfactory. Timco Engineering does not understand your question. The Modular Approved Circuit Cards were FCC approved and fulfilled all rule requirements including DFS Test Requirements. The Applicant stated this previously. Test Reports, including SAR Testing, on previously approved Modular Approval Circuit Cards with FCC IDs are available on the FCC Web Site. Timco Engineering would not have issued a Grant of Certification if the devices in question were not within appropriate FCC Rules. Please help us understand your question.

Very truly yours,  
Timco Engineering