

dward

From: kumagaik@a-pex.co.jp
Sent: Wednesday, March 19, 2003 4:53 AM
To: dward@americantcb.com; dennis@yosemite.net
Cc: kanako@a-pex.co.jp; tmaeno@a-pex.co.jp; Bill Graff
Subject: RE: New Project Wireless LAN Card(FCC ID:AK8PEGAWL110)

Dear Dennis,

I suppose there are slight difference of opinion between us about this matter. Anyway our customer is pushing us to obtain grant for this device everyday so we have to solve these problems as soon as possible. Please give us your immediate advice and help.

1. About EMC report

Is there any problem with the report?

2. About SAR Report

1) We will conduct additional test with using PDA.

2) We will only test with one PDA, because the power of WLAN card is below 100mW.

3) We will test the device with body SAR measurement. The reasons are as follows.

- While Card of GSM have possibility to use as cell phone, the WLAN card of 802.11b is not used for PDA as cell phone.

- Please refer to the test report of "FCC ID: P4JDTE-3" on FCC web site. This device have GSM function, so there is no wonder if they apply Head SAR measurement. However, this test report does not include the result of Head SAR measurement.

3. Form Factor

This card is CompactFlash Card and can be inserted into PCMCIA slot with using adapter. Mostly It can be inserted directly into PDA. So how can we explain about Form Factor, please give us advice.

4. Co-located (Co-operating)

This is not applicable for WLAN card itself, testing is only required for PC or PDA which is using this WLAN card. Therefore, "must not be co-located or operating in conjunction" will be stated in grant as assumption of approval.

I appreciate for your speedy response about this matter and I am looking forward to hearing from you.

Best Regards,

Keijiro Kumagai
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2003/03/15 6:19:48、"dward"さんは「RE: New Project Wireless LAN Card(FCC ID:AK8PEGAWL110)」で書きました

> Hi Keijiro

> The 'form factor' in this situation is talking about the method used
 > to connect to another device and the size of the device. For example,
 > the
 card
 > can be plugged into an adapter which could then be plugged into a
 > normal PCMCIA slot. The connection between the card and the adapter
 > however,
 has
 > not been clearly identified. I cannot assume that it is a PCMCIA nor
 > can
 I
 > assume that it is not a mini/PCMCIA form factor. This information
 > needs
 to
 > be provided.
 >
 > For SAR, please note that the FCC is specifically concerned about
 > these
 new
 > type devices that can be used in cell phone PDA arrangements. Please
 note
 > that there are a number of PDA 'phones' that are used held to the head
 and
 > there is no indication that steps have been taken in the design of
 > this
 item
 > to prevent use in that situation. While the antenna(s) for these
 > devices may not be actually against the head, the manner in which
 > these phones
 are
 > held is in the typical cell phone position next to the head.
 Consequently,
 > body SAR is inappropriate for this type configuration.
 >
 > If you can show that the device could not be used in any currently
 available
 > PDA cell phone configurations, then you may only need to do body SAR
 > for
 the
 > PDA shown in the manual. However, simply stating that it is not
 recommended
 > is not enough. There must be methods in place to prevent such use.
 Since
 > it is highly unlikely that such use can be prevented and since SAR is
 very
 > dependent on the type device, SAR for the PDA will have to be done.
 > SAR
 in
 > the PDA Sony mentions can be done using Body SAR, however, again,
 > since
 this
 > device WILL find it way into a PDA cell phone, Sony needs to address
 > this issue as well (head SAR).
 >

> Also, please note that if the device can operate simultaneously with a PDA
> cell phone, then the FCC may have to issue the grant in that scenario.
>
> Thanks
> Dennis
>
> -----Original Message-----
> From: kumagaik@a-pex.co.jp [mailto:kumagaik@a-pex.co.jp]
> Sent: Friday, March 14, 2003 3:57 AM
> To: dennis@yosemite.net; dward@AmericanTCB.com
> Cc: kanako@a-pex.co.jp; tmaeno@a-pex.co.jp
> Subject: RE: New Project Wireless LAN Card(FCC ID:AK8PEGAWL110)
>
>
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>
> Dear Dennis,
>
> Please check our reply for your comments. Please confirm.
>
> 1. I do not understand what "Form Factor" is? Please explain this
> comment in more detail.
>
> 2. At the moment, this WLAN card is intended for PDA, however, for
> expand the possibilities for PC, we conducted SAR testing with 3 PC.
> We wanted
to
> test this device with PDA, however, for the licensing reason, we could
not
> set software for testing transmission for PDA. Because of that, we
> tested this device with worst condition using extension board
> additionally. Is
it
> acceptable? We are aware that if output power of the device is higher
than
> 100mW, we are required to test with using 3 host device.
>
> eg. make usable for PC and PDA --> We have to test with 3 of each host
> device(PC1, PC2, PC3, PDA1, PDA2, PDA3).
>
> If a device is under 100mW, what do we do? Please inform us.
>
> eg. make usable for PC and PDA --> We need to test with only 1 of each
host
> device (PC1, PDA1).
>
> Am I correct about case of under 100mW?
>
> 3. We understand what you mean but we do not think most of PDA can
> use
as
> cell phone with touching directly to face. So could we just use any
> PDA

to

> measure Head SAR with Body SAR position?

>

> 4. In our opinion, it is not a problem of LAN card itself, but it is a

> problem for a device which use WLAN card. For LAN card we need to put

> following statement in the manual. "This transmitter must not be

> co-located with any other transmitter or antenna"

>

> 5. The answer for this comment contains in answer No.4 above.

>

> 6. The answer for this comment contains in answer No.2 above.

>

> Please confirm.

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>

> Best Regards,

>

> Keijiro Kumagai

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> 2003/03/12 6:17:50、"dward"さんは「RE: New Project Wireless LAN Card(FCC

> ID:AK8PEGAWL110)」で書きました

> > Hi Keijiro

> > Attached are my comments

> > Thanks

> > Dennis

> >

> > -----Original Message-----

> > From: kumagaik@a-pex.co.jp [mailto:kumagaik@a-pex.co.jp]

> > Sent: Tuesday, March 11, 2003 2:28 AM

> > To: dennis@yosemite.net

> > Cc: dward@AmericanTCB.com; kanako@a-pex.co.jp; whgraff@qwest.net

> > Subject: Re: New Project Wireless LAN Card(FCC ID:AK8PEGAWL110)

> >

> >

> >

> >

> > Dear Dennis,

> >

> > Today we received inquiry from our customer that does our customer

> > need

> to

> > contain following statement in the manual of WLAN Card (FCC

> > ID:AK8PEGAWL110)."This transmitter must not be co-located with any

> other

> > transmitter or antenna." Do you think our customer need above

> statement?

> > Similar statement are in their manual as IC RF Exposure statement.

> Please

> > check and tell us if our client need to contain above statement in

> their

> > manual?

> >

> > Best Regards,

> >

> > Keijiro Kumagai

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> >

> >

> >

> > > Dear Dennis

> > >

> > > Today I uploaded application documents of Sony Corporation,

> > > Wireless

> LAN

> > Card(FCC ID:AK8PEGAWL110) for FCC Part15 SubpartC Certification.

> > Please verify and immediately let us know if there are any

> > > missing documents or information.

> > >

> > > Our client asked us to hold the issuance of grant until 3/25/2003,

> > > so

> > please do not issue grant of this device until 3/25/2003. Section

> > III-2

> of

> > Form 731, I put requesting date of issuance of grant.

> > > So please confirm.

> > >

> > > I appreciate for your cooperation. I am looking forward to hearing

from

> > you.

> > >

> > > Best Regards

> > >

> > > Keijiro Kumagai

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> > - 3-10-03 AK8PEGAWL110_ATCB Comments.pdf

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