

Response to ATCB request

Dear Tim.

The following is a response to your request for information.

- 1: A higher resolution block diagram has been uploaded.
A clearer photograph of the back of the main transmitter board has been requested of the lab. Since the intent of 2.1033b7 in providing photographs etc. is to provide evidence of the construction of the device, in lieu of additional photographs, please accept the master layout drawing of this board that I have provided. This master layout shows the construction and component placement in detail. Is this acceptable?
A photograph of the back of the Bluetooth module has been requested of the lab. Please note however, that this is a soldered board level component similar to a CPU chip on the EUT. Also, since there is nothing on the bottom side of this component, I have provided the master layout masks of this module and the board on which it resides. Please accept this in lieu of de-soldering the component.
- 2) I have requested the information from the manufacturer. However, please note that the Bluetooth 'modular' section is treated as a component in this system. The schematics of the 'transmitter' show this modular component as it is used in the system with input and output information. This is in the same manner as other chips or components are shown. Please note that the master layout mask shows the Bluetooth board-component part number. While Parts Lists are not required for Part 15 devices, please accept this as meeting your request for verification that this is a component of the EUT.
- 3) RF exposure statement. I have provided a copy of the email between Microsoft and the FCC on rf exposure statements for these devices. Please accept this email as evidence that the suggested or similar wording that appears in the manuals is appropriate. Please note that the FCC has stated that no specific caution language is mandated. As such, any reasonable wording with the intent of cautioning or giving instructions to the user about rf exposure should be deemed appropriate.

Because of the response of the FCC and since the MPE calculations show the device compliant at less than 0.3cm we request that accept the wording as provided and as 'de-facto' approved by the FCC in their email response.

- 4 The Horn antenna in section 8.1 of the radiated test report that was used for measurements between 1-18GHz was the EMCO 1-18 GHz Horn Antenna 3115 9205-3882 listed on line 6 which has a cal due date of 10/21/2002. The other antenna was not used during compliance testing.
- 5 The VBW settings used for the peak radiated emissions was equal to or greater than the Res BW as required in the test method.
- 6 The EUT is the Bluetooth Keyboard itself, not the Bluetooth modular component contained within the keyboard. While the antenna-conducted measurements were done on the rf modular section, the cable mentioned is the USB cable of the keyboard which was connected to a computer during testing.

If you have any questions or if you need further explanation, please contact as soon as possible
Thank you

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