

Mike Kuo

From: Generic Office of Engineering Technology [oetech@fccsun27w.fcc.gov]
Sent: Friday, February 24, 2006 12:13 PM
To: Mike Kuo
Subject: Response to Inquiry to FCC (Tracking Number 583882)

Inquiry:

Please consider this inquiry is confidential and not for public. CCS/TCB received a 802.11 a/b/g client device for FCC equipment authorization. Attached please find the user manual. Based upon the user manual, this 802.11 a/b/g client device can be used by the user in the following two ways : 1) by using supplied USB cable and stand, this 802.11 a/b/g client device can be placed on the tablet top and maintain at least 20 cm separation distance to the end user. (Stand photo) 2) By using supplied USB cable, this 802.11 a/b/g client device can be clipped on the top of LCD panel of notebook computer and maintain at least 20 cm separation distance to the end user. (Clipped on photo) However, due to this 802.11 a/b/g client device is equipped with standard USB 2.0 connector, the end user may directly connect to notebook USB connector without using supplied USB cable. (Direct connection photo). Due to this device is not by design to prevent this client device to be used only in a mobile configuration, CCS / TCB requests this client device to be tested for SAR evaluation and submit to FCC for approval due to 5 GHz SAR evaluation. The applicant (Buffalo) would like to have second opinion from FCC to determine the RF exposure condition. Question #1: Shall this device be classified as mobile device (2.1091) or portable device (2.1093) ? Best Regards Mike Kuo

Response:

Due to clear description in text, for this reply we did not look at attachments.

Based on description, this seems to fall within scope of TCB info-meeting and/or Conf. Call notes from several years ago where it was said that devices with standard USB plug and marketed with removable extender-cable are considered to operate in portable RF exposure conditions.

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