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Joe Dichoso
FCC Application Processing Branch
Colombia, MD

Dear Joe:

This is in response to your request for additional information regarding FCC ID KDZLXE6726P, set forth in your correspondence reference number 21533. Regarding item :

- 1) External photos of host and antenna requested: New photo exhibit uploaded, entitled 'Antenna photos'.
- 2) Updated RF Safety statement in our Operator's Guides to state that the device is not to be co-located with other transmitters. Revised RF Safety Statement is shown here:

Caution 	<i>This device is intended to transmit RF energy. In accordance with FCC and Industry Canada radio frequency safety regulations, when operating this device with the Hip-Flip accessory, it should be used in accordance with the users instructions. Additionally, the user should take care to insure that a minimum separation distance of 20cm (7.8 in.) is maintained from the antenna to nearby persons. Use of this device not consistent with these instructions can increase the risk of RF exposure. This device is not to be co-located with other transmitters.</i>
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- 3) Confidential letter from Cisco requested; letter has been uploaded as exhibit.
- 4) In the RF Safety compliance report submitted, a distance of 15 cm is indicated between the radiating antenna in the MX3 and the user, when a hip-flip accessory is employed. In the RF Safety statement published in the MX3 Operators Guide, we recommend keeping a separation distance of 20 cm between the end of the MX3 and *other people*. The RF Safety statement published by LXE is more conservative than is required. See item 10 for further clarification.
- 5) Bandedge plots and data demonstrating compliance in the restricted band 2485.5 MHz – 2500 MHz have been uploaded as separate exhibit, entitled 'Addendum 1'.
- 6) The unique connector used is an MMCX type connector.
- 7) Output power – requested 100 mW, data shows 52 mW. Revised output power data uploaded as exhibit, entitled 'Revised power levels'.
- 8) The device has two ports that **do not** transmit simultaneously. Data and plots of comparative conducted emissions between right and left ports has been uploaded as separate exhibit, entitled 'Left vs right ports'. No notable difference between ports.

9) Compliance with modular approval requirements:

- The device was tested standalone, by utilizing a PCMCIA extender card that brings the EUT outside of the host PC. Additional test setup photo uploaded as exhibit.
- The device has its own RF shielding. Internal shields can be viewed in the internal photo exhibit. External shield may be viewed in the external photo exhibit.
- The device has its own voltage regulation – it cannot be operated over 5.5 Vdc input.
- The device has its own data buffering.
- The device complies with the antenna requirements of Section 15.203 & 15.204(c) by employing a smaller than normal footprint, MMCX type connector. When used in an Access Point host, the connector accessible is an R-TNC type. All antennas offered for sale with this device by LXE are included in the filing.

10) RF safety calculations: This filing includes only one host, the LXE MX3 series. (The device is filed separately for mobile hosts, under KDZLXE6726M). The MX3 employs a 0 dB patch antenna; the radio output power is 20 dBm. The MX3 may be used in a body-worn configuration, at the waist, used the “hip-flip” accessory. When used with the hip-flip accessory, the antenna is positioned at least 15 cm from the user’s body. To calculate the absolute worst-case distance that must be maintained to comply with MPE limits set forth in OET Bulletin 65, Table1:

$$R = \sqrt{\frac{1.64ERP}{pS}}$$

$$R = \sqrt{\frac{1.64(20 + 0)}{p \times 1}}$$

$$R = 3.23 \text{ cm}$$

As can be seen from the calculation, when used with the hip-flip accessory, the transmitting antenna of the MX3 is positioned well beyond the MPE limits of compliance.

11) The radiated tests for this device were performed using a 6 dB patch antenna, in a PC host, with the transceiver installed on a PCMCIA extender card. The testing for this application is the same testing used for FCC ID KDZLXE6726M. It was judged that since the 6726 transceiver is a modular device, and that testing for the mobile grant included a configuration employing a 6 dB patch antenna, that the test data from that application could reasonably be used with this application. The MX3 host employs a 0 dB internal patch antenna.

12) Schematic, block diagram, and operational description has been uploaded as exhibits.

13) Processing gain data has been uploaded as a separate exhibit.

Sincerely,



D.C. Massey
Lead Regulatory Engineer