



Elliott Laboratories Inc.
www.elliottlabs.com

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October 08, 2002

ATCB
6731 Whittier Ave
Suite C110
McLean, Va. 22101

Dear Application Examiner:

Limited Modular approval for the device is being requested.

The device does not meet two out of the eight requirements outlined in FCC Public Notice DA 00-1407 Released: June 26, 2000. The reason for the request is that, although it has its own RF shielding, the MINI PCI card depends on the Laptop host to provide additional shielding to be in compliance.

The MINI PCI will be sold to specific Laptop vendors, only. It will not be sold to the general public. This will allow Actiontec to have full control of the compliance of the MINI PCI card when it is installed on a different Laptop.

Proper installation instructions are provided to the Laptop vendor, so that they are fully aware that additional testing must be performed before selling the Laptop, with the MINI PCI card, to the general public. The Laptop vendor will be provided with specific instructions about the RF exposure, such as not using a different antenna and unauthorized changes to the MINI PCI card is not allowed, and that additional compliance for the radiated emission must be performed.

- 1) The modular transmitter must have its own RF shielding.
The EUT contains its own RF shielding, but was tested inside an enclosure to be in compliance. Limited modular approval is requested for this requirement.
- 2) The modular transmitter must have buffered modulation/data inputs.
EUT has buffered data inputs to insure compliance with Part 15 requirements under conditions of excessive data rates or over- modulation. Please refer to the schematics (Page 1) and the Theory of Operation (Page 1 of 2)
- 3) The modular transmitter must have its own power supply regulation.
The EUT has its own power supply regulation to insure compliance with Part 15 requirements regardless of the quality or level of external DC supplying the module from the host unit.
- 4) The modular transmitter must comply with the antenna requirements of Section 15.203 and 15.204(c).
The MPCPI will be installed on the inside part of the Laptop. The antenna(s) are placed on the inside of the Laptop (Please refer to Antenna specification sheet showing the location of the antenna in the laptop label “R40 Antenna Specs and Installation”) and so meets all requirements of 15.203.
- 5) The modular transmitter must be tested in a stand-alone configuration.
The EUT was tested inside an enclosure to be in compliance. Limited modular approval is requested for this requirement.
- 6) The modular transmitter must be labeled with its own FCC ID number, and, if the FCC ID is not visible when the module is installed inside another device, then the outside of the device into which the module is installed must also display a label referring to the enclosed module.
The devices containing the module will be labeled with the FCC ID of the module.
- 7) The modular transmitter must comply with any specific rule or operating requirements applicable to the transmitter and the manufacturer must provide adequate instructions along with the module to explain any such requirements. A copy of these instructions must be included in the application for equipment authorization.
The operating limitations are fully understood by their engineering division.
- 8) The modular transmitter must comply with any applicable RF exposure requirements.
Please refer to SAR Exclusion statement. The User manuals for products containing this module will all reference this requirement.



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If there are any questions or if further information is needed, please contact Elliott Laboratories for assistance.

Sincerely,

A handwritten signature in black ink that reads 'Juan Martinez'.

Juan Martinez
Senior EMC Engineer

JM/dmg