

Response to Correspondence Reference Number 4963

Dear Joe

This is in response to your request for information on - FCC ID: PANBT0002M

Applicant: CC&C Technologies, Inc.
Correspondence Reference Number: 4963
731 Confirmation Number: TC428870
Date of Original Email: 08/23/2002

Each subject is answered immediately after your question.

Subject:

1) The filing does not contain the reply to the TCB requested information. Please submit the grantee reply after you are satisfied with their reply. In particular, interest is the classification of whether or not this is a mobile or portable device and the correction of the manual, grant condition and RF safety exhibit accordingly.

The answer from the applicant was provided as a pdf file "Response to ATCB request.pdf". This basically stated that item one (label size) was too small, and that all other items were answered in the revised files. I have created another pdf file from an email sent stating that retesting was being done as an answer to items 2-5 and 7. Since re-testing was being performed, it was not necessary to provide both the old and new report. However, since the FCC has requested how the client answered ATCB questions and why the limited modular approval was given, I have provided the original report, the original manual and the original MPE calculations to the FCC server.

***As to why the classification of limited modular approval --
The MPE statement provided shows the calculations using the new report information. While the distance for safe MPE calculates to about 1/2cm, the MPE report and manual recommends 20cm separation. While the device appears to be capable of portable use, the test lab recommend this 20cm 'safe' distance and did not change the classification as mentioned in the request for information, also, the manufacturer states in the manual "... IMPORTANT NOTE: To comply with FCC RF exposure compliance requirements, the antenna used for this transmitter must be installed to provide a separation distance of at least 20 cm from all persons and must not be co-located or operating in conjunction with any other antenna or transmitter."***

Because of these, I placed this limit on the module to require that the intent of the manufacturer be met.

2) Please explain why the authorization is for a limited modular approval. What is the authorization limited to?

In addition to the above, the limited modular approval limits the device to only those antennae tested with the device and to a minimum of 20cm between device and antenna (i.e. mobile and not portable).

On page 3 of the revised manual, it states:

End Product Labeling

This transmitter module is authorized only for use in device where the antenna may be installed such that 20cm may be maintained between the antenna and users (for example access points, routers, wireless ADSL modems, and similar equipment).

And:

Manual Information That Must be Included: (page 3)

... IMPORTANT NOTE: To comply with FCC RF exposure compliance requirements, the antenna used for this transmitter must be installed to provide a separation distance of at least 20 cm from all persons and must not be co-located or operating in conjunction with any other antenna or transmitter.

This is modular approval and only two antennas have been tested with this device. Only those antennas tested in the certification application are authorized. Any other antenna used with the module may require a separate authorization and ID number.

Hopefully this has answered your concerns about the grant. If the FCC desires to remove the limitations and grant the device for use in portable hosts please let me know.

Thanks for your assistance in this matter

Dennis Ward

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