

From: Generic Office of Engineering Technology <oetech@fccsun27w.fcc.gov>
Subject: Response to Inquiry to FCC (Tracking Number 127104)
To: tjohnson@ATCB.com

Inquiry:

We are reviewing an Access Point under 15.247 that also contains a PCMCIA slot. From review this application, it appears this slot is intended for co-location use with a licensed device, FCC ID: QZX99171001 (approved by a different manufacturer - also we are uploading a copy of this grant). The grant for the PCMCIA card was approved for portable use in laptops only and with a non-colocation requirements. The concern here is that in use with the Access point, the device would a) not be used in a laptop, b) is not mobile vs. portable use, c) is co-located. Even though this is to be co-located in a mobile device and will easily meet the limits, the concern comes from the fact that the use of the device is not in compliance with the limitations stated on the grant. We have told the manufacturer that ideally the previously approved PCMCIA card should have a Permissive Change application done to properly handle the new co-located, mobile, and host conditions. Alternatively we have stated that the the manufacturer of the access point may do a change of ID to the PCMCIA card, and then submit a Permissive Change application afterward to correct the new colocated, mobile and host conditions. These instances are usually more difficult for the manufacturer when they only have ownership of one of the 2 devices. While either of the above 2 conditions are valid, because of these ownership situations we have also seen where the FCC has accepted applications where the co-location is handled only in one of the 2 applications involved. We are inquiring to ask if this may be used in this instance, or will the FCC require that the PCMCIA device have a Permissive change (or alternatively a change of ID + Permissive Change to the new ID) be done. Please let us know.

Response:

The inquiry concerns certain desktop, wall-mount, etc. final-products (mobile RF exposure conditions where persons are normally 20 cm or more away), which contain one built-in part 15 transmitter typically operating in 15.247 (2.4-2.482, 5.725-5.85 GHz) and/or 15.407 (5.15-5.35, 5.725-5.825 GHz), typically intended to serve gateway and/or backbone functions between 802.11abg-WLANs and WWANs (wireless wide area networks).

For the WAN part, it is understood that such "gateway" products are intended always to be used with end-user-plug-in integral-antenna radio cards (e.g., PCMCIA, Cardbus, CompactFlash), operating in licensed radio services (e.g., parts 22 and/or 24, 27, 90; maybe some 21, 74), for which most presently-available cards have certification applications in accordance with the FCC Lab 3-host SAR test procedure to support use in certain portable RF exposure conditions.

Grantee for part 15 gateway-device is responsible to ensure compliance with FCC rules for intended and expected end-use configurations. Certification applications should document configuration conditions and/or specific radio cards, including measurement data where appropriate, to ensure compliance with applicable part 15, licensed-service, and RF exposure (mobile condition) rules.

For most typical integral-antenna radio cards meeting the preceding configuration and collocation conditions, FCC Lab at present is not requesting permissive change filings to amend the certification contents and grant notes.

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