



RE: Broadcom
FCC ID: QDS-BRCM1022

1 The C2PC request letter refers to B1 Silicon as having been changed. Please provide a description of the "B1 Silicon" component

Response: B1 silicon is a lower power chip to extend the laptop battery life. The Silicon update has been referenced in generic terms for the following reasons:

- The changes are all inside the Baseband IC and are therefore complex to explain.
- The changes are to correct bugs some of which might include proprietary functionality which is Broadcom confidential.
- The changes do not affect regulatory performance. We perform appropriate regression testing to ensure this.

Given that the changes in the B1 Silicon are inside the Baseband IC, and given that the original the device was CERTIFIED to FCC 15B (The 15B part of the device was NOT covered with a DoC) There does not appear to be any FCC 15 B data (eg radiated emissions from 30MHz to 1 GHz) included in the report. Please outline why 15B testing is not applicable given the changes to the baseband silicon. Or, if required, please provide the applicable data.

Response: Here is the client. In addition I just have provided the Data to show the digital emissions are in compliance. We do not require as Class II change for the digital, but due for the Radio. As you might know Modular devices digital device is the responsibility of the OEM in this case we are not requesting such a request for the certification of the grant that was made for the PC peripheral application.

An earlier version of the card was certified as a peripheral and Class B testing was performed as per ANSI 63.4 for DoC purposes of a single customer. Normally we do not approve these products as peripherals. A product may be approved under the same ID in various forms. During the lifecycle of the product a customer will typically only take one version of the product however in certain circumstances a customer may have a refresh to include a later version (e.g. cost reduced versions,...).

For example:

Rev 4.3 PA1, Silicon Ver1.0 Customer A - Approved as peripheral
Rev 5.11 PA2 Modification Customer B&C - Peripheral approval not required, Class B testing not required
Rev 6.4 Silicon Ver2.0, Shield Modification Customer D - Peripheral approval not required, Class B testing not required
Rev 7.x PA3 cost reduced Customer B refresh - Peripheral approval not required, Class B testing not required
Rev 8.x Silicon Ver3.0 Customer A - Approved as peripheral, Class B testing testing/update is required.

In this case we/the customer do not require that the WLAN card be approved as a peripheral so we do not believe that this testing or Subpart B certificate update is required. In the above example only customer A would require the Class B testing to ANSI 63.4. If the testing has already been performed then we have not problem with updating the Class B certificate just let us know what you need.

Also note that any description of the changes that may be Broadcom confidential may be considered Operational Descriptions and therefore be subjected to FCC confidentiality.

Response: No confidentiality requested as this does not give detail description of Silicon chip.

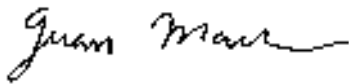
2: From the reply to the original comments:

Response: The applicant is aware that the Power, emissions, and Bandedges were tested above what was previously certified. The applicant further stated that the power would certainly be lowered to reflect what was previously approved too. I note has been place in the data to explain this accordingly.

Please indicate where this note is located. I could not find it.

Response: This can be found in pg 86 of 104 or test data page 56 of 65.

Regards,

A handwritten signature in black ink that reads "Juan Martinez". The signature is written in a cursive, flowing style.

Juan Martinez
Sr. EMC Engineer