



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

July 15, 2004

RE: Uniwill Computer Corp.

FCC ID: SAZ-2200BG223

After a review of the submitted information, I have a few comments on the above referenced Application.

Administrative Issues:

- 1) The block diagram for the TX must include oscillator frequencies. Please update.
- 2) Pages 14, 107, and 56-58 of the users manual mentions that the user may install an optional Wireless Ethernet. This is not allowed. Installation of the WLAN device may not be allowed except by the applicant or their OEM integrators. Please adjust the users manual appropriately.
- 3) FYI...Declaration of Conformity information in the manual is lacking information. All the following information should be placed on a single page in the users manual for the end user.

COMPLIANCE INFORMATION FOR DoC AUTHORIZATIONS (47CFR 2.1077)

If a product is tested and authorized under a Declaration of Conformity, a compliance information statement shall be supplied with the product at the time of marketing or importation, containing the following information on a single page (as a separate sheet or in the users manual):

- (1) Identification of the product, i.e. name and model number.
 - (2) A statement similar to that contained in Section 15.19(a)(3) that the product complies with Part 15 of the regulations.
 - (3) The identification, by name, address and telephone number, of the responsible party. The responsible party is defined as either the manufacturer, or if the equipment is imported, the importer. The responsible party for a Declaration of Conformity must be located within the United States.
- 4) The users manual does not appear to contain information regarding RF exposure. Please correct.

Technical Issues:

- 5) It is uncertain whether a modular approval is being requested or not. However please note that the current application does not appear to sufficiently justify a modular approval and modular approvals are not typically allowed on a portable device. Please note that labeling appears to be for approval of the entire laptop, not a modular TX and the test configuration photographs also only appear to support approval of a laptop device, not TX module. Please remove the request for Modular Approval or call to discuss further. Note that the proposed grant notes are written such that a Permissive change may be performed using a different laptop configuration as long as the same TX card is used. See proposed grant notes below.

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- 6) Page 13, page 107, and appendix C of the users manual mentions an optional Bluetooth device. Note that this application does not contain information regarding co-location and it appears that the SAR has not been tested for co-location conditions. Therefore co-location will not be allowed. Optionally, information to support co-location may be provided. Note co-location is defined as occurring when the antenna of the Bluetooth module is < 20 dm from the WLAN modules. This may be the case for both antennas, or possibly only one. If co-location is to be included, please provide additional SAR and EMC simultaneous TX results for this condition, and also photographs to show the distance between the Bluetooth and WLAN antennas.
- 7) The required SAR value on page 24 (13.8) does not appear to agree with the dipole calibration information. Please explain where the value for Required SAR on page 24 was obtained.
- 8) The probe calibration information on the plots (4.6, 4.6, 4.6) does not appear to agree with calibration information.
- 9) It appears that the probe may have been out of calibration during the test. Please explain.
- 10) The information for the probe on page 6 appears to match the calibration certificate, but appears out of calibration. In addition, the calibration information used on the test plots is not the same as page 6 and the calibration certificate. Note that all information should be in calibration, and all information should match.
- 11) FYI.....Proposed Grant Notes:

Output power is Conducted. The Mini-PCI Card is to be installed in the specific notebook computer(s) shown in this filing only by the grantee or their designated OEM integrator – user installation is prohibited. Installation of this device into other host products requires the submission of a Class II permissive change application containing data demonstrating compliance for SAR, spurious emissions, or new application if appropriate. Compliance of this device in all final host configurations is the responsibility of the Grantee. The antenna(s) used for this transmitter must not be co-located or operate in conjunction with any other antenna or transmitter. The SAR data in this filing is applicable to demonstrate compliance for the final host product(s) only as shown in this filing. End-users must be provided with operating instructions for satisfying RF exposure compliance requirements. The highest SAR values reported are: Body; XXX W/kg.



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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.