



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

August 5, 2003

RE: FCC ID: AK8PCG492L

Attention: Kanako Sanda / Yoshiko Mizuta

I have a few comments on this Application.

1. Please provide a drawing or photo of where the card is located in the laptop. -
2. Please note that the draft document "Operational Description.pdf" shows a reported SAR of 0.0687w/kg and the SAR report shows 0.101w/kg. Please make documentation consistent. Please correct documents to reflect the actual measured SAR levels. -
3. Please note that the maximum conducted power measured during SAR testing is 22dBm (158mW OFDM modulation on page 17 of SAR report) and the maximum measured conducted power during the EMC testing was 19.5dBm (89mW on page 37 of EMC report). Please note that while there is sometimes an allowable variance of up to 3dB for EIRP powers between the EMC and SAR reports, the FCC requires that the maximum variance between the maximum conducted power in the EMC report and the maximum conducted power in the SAR report be no more than 5%. Please note that the variance between the SAR report values and the EMC report values in your application is almost 45%. This is not acceptable. Please provide EMC and SAR reports that are within 5% of each other for maximum conducted power measurements. -
4. While I see that before and after conducted power measurements were made and provided on page 17 of the SAR report, please explain why power drift was provided only on the validation plots and not provided on the data plots are requested by the FCC. -
5. Please note that the manual indicates that this device is for use in the EU also. Please note that, as you may know, the frequency channels used in the EU are different that in the US (i.e. 2412 to 2462 MHz operation only in the US). Please also note that the FCC has stated that under no circumstance can any other channels than channels 1 through 11 be used in the US, and under no circumstance can selection of any other channels than these be possible for a device used in the US. Please confirm that there is no software or hardware switch, setting or other capability that will allow the selection of channels 12 or higher in this device. -
6. Please note that Sony not Hewlett Packard is the grantee of this device. Consequently Sony is the responsible party. Please note that on page 29 of the manual you state, "The FCC requires the user to be notified that any changes or modifications made to device that are not expressly approved by the Hewlett-Packard Company may void the user's authority to operate the equipment." This is not a proper statement as HP has no authority over this device. Please correct the non-modification statement by replacing Hewlett Packard with Sony's name. -

Dennis Ward

<mailto:dward@AmericanTCB.com>

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.