

Chris Harvey

From: September Radecki [september.radecki@ccsemc.com]
Sent: Tuesday, June 26, 2007 12:59 PM
To: Chris Harvey; Chris Harvey -TCB
Cc: Michael Heckrotte
Subject: RE: ATHEROS COMMUNICATIONS, INC., FCC ID: PPD-AR5BXB6, Assessment NO.: AN07T6920, Notice#1
Attachments: MPE Information.pdf; 07U11071-1B1 FCC UNII C2PC Report.pdf; AR5BXB6 FCC C2PC Cover Letter Lenovo DFS Revised 2007-6-26.pdf

Hi Chris,

Below are the answers to your questions on Notice #1 and Notice #2.

1. According to the Class II Permissive Change (C2PC) Cover Letter exhibit, this application has been filed to include DFS capabilities and co-locate with a UWB transmitter in one configuration. The C2PC Cover Letter states that the DFS is to be added in the 5250 - 5350 MHz and 5470 - 5725 MHz bands. Please note that this device has not yet been approved for operation in the 5470 - 5725 MHz band. Apparently, this C2PC application is also being submitted to add the 5470 - 5725 MHz UNII band, but the C2PC Cover letter does not state so. Please confirm and then update the C2PC Cover Letter to include the fact that the 5470 - 5725 MHz band is being added by a change of firmware controlled/installed by the Grantee or their authorized representative.

<CCS Answer:> Please see attached revised C2PC Cover Letter. This application is to add the 5470-5725 band and add DFS compliance.

2. The UWB test report for co-located FCC ID: MCLT60H990 has been included as an exhibit in this WLAN Class II Permissive Change application. This UWB exhibit is not required documentation for this WLAN application and also is not allowed to be reviewed by a TCB (on the TCB Exclusion list). Please confirm that this UWB report is to be removed from this application submission and I will remove it accordingly.

<CCS Answer:> Please remove the UWB report from the exhibits on this submission.

3. The Class II Permissive Change implies that the DFS testing of FCC ID: PPD-AR5BXB6-M was applicable to this device. However, the test report contains DFS testing data for operation at the 5300 MHz channel without an indication of which device was tested. Please confirm if the DFS testing was performed on the sample for FCC ID: PPD-AR5BXB6-M or FCC ID: PPD-AR5BXB6, and whether the testing at the 5300MHz channel is representative of all channels in the 5250 - 5350 MHz and 5470 - 5725 MHz bands.

<CCS Answer:> Testing at the 5300MHz channel is representative of all channels in the 5250 - 5350 MHz and 5470 - 5725 MHz bands.

4. The RF Exposure Justification maximum antenna gains in each band are lower than the maximum antenna gain listed in the RF test report exhibit. Please confirm that the RF testing was actually performed with the highest gain antennas approved for use with this device and update the RF Exposure Justification to reflect the highest gain in the co-location configurations.

Please note that previous approvals of this modular device included SAR

6/26/2007

testing for portable configurations. This application adds the 5470 - 5725 MHz band, but does not include portable configurations. Therefore use of the 5470 - 5725 MHz band is restricted to Mobile RF Exposure configurations. Please include the response to the above item along with the response to the items below.

<CCS Answer:> This C2PC is only for mobile configuration. Please remove the RF Exposure document that you have from the exhibits, and please replace with the attached MPE Information document. Please also see attached Revised C2PC Letter and Revised Test Report.

Thank you.

Best regards,

September
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 Compliance Certification Services
 47173 Benicia Street
 Fremont, CA 94538
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September.Radecki@CCSEMC.com

-----Original Message-----

From: Chris Harvey [<mailto:charveyemc@verizon.net>]
 Sent: Wednesday, June 20, 2007 4:32 AM
 To: Chris Harvey; Michael Heckrotte
 Cc: September Radecki; Chi Tsou; Claire Hoque
 Subject: RE: ATHEROS COMMUNICATIONS, INC., FCC ID: PPD-AR5BXB6, Assessment NO.: AN07T6920, Notice#1

Michael, I have found another discrepancy in the exhibits submitted with this application, which also needs to be addressed:

4. The RF Exposure Justification maximum antenna gains in each band are lower than the maximum antenna gain listed in the RF test report exhibit. Please confirm that the RF testing was actually performed with the highest gain antennas approved for use with this device and update the RF Exposure Justification to reflect the highest gain in the co-location configurations.

Please note that previous approvals of this modular device included SAR testing for portable configurations. This application adds the 5470 - 5725 MHz band, but does not include portable configurations. Therefore use of the 5470 - 5725 MHz band is restricted to Mobile RF Exposure configurations. Please include the response to the above item along with the response to the items below.

Best regards,

Chris Harvey

-----Original Message-----

From: charvey-tcb@ccsemc.com [<mailto:charvey-tcb@ccsemc.com>]
 Sent: Tuesday, June 19, 2007 3:28 PM
 To: Michael.Heckrotte@CCSEMC.COM
 Cc: charvey-tcb@ccsemc.com; september.radecki@ccsemc.com
 Subject: ATHEROS COMMUNICATIONS, INC., FCC ID: PPD-AR5BXB6, Assessment NO.: AN07T6920, Notice#1

Dear Michael Heckrotte,

6/26/2007

You are listed as the technical contact for the above referenced TCB application. The following items need to be addressed before the review can be continued:

1. According to the Class II Permissive Change (C2PC) Cover Letter exhibit, this application has been filed to include DFS capabilities and co-locate with a UWB transmitter in one configuration. The C2PC Cover Letter states that the DFS is to be added in the 5250 - 5350 MHz and 5470 - 5725 MHz bands. Please note that this device has not yet been approved for operation in the 5470 - 5725 MHz band. Apparently, this C2PC application is also being submitted to add the 5470 - 5725 MHz UNII band, but the C2PC Cover letter does not state so. Please confirm and then update the C2PC Cover Letter to include the fact that the 5470 - 5725 MHz band is being added by a change of firmware controlled/installed by the Grantee or their authorized representative.
2. The UWB test report for co-located FCC ID: MCLT60H990 has been included as an exhibit in this WLAN Class II Permissive Change application. This UWB exhibit is not required documentation for this WLAN application and also is not allowed to be reviewed by a TCB (on the TCB Exclusion list). Please confirm that this UWB report is to be removed from this application submission and I will remove it accordingly.
3. The Class II Permissive Change implies that the DFS testing of FCC ID: PPD-AR5BXB6-M was applicable to this device. However, the test report contains DFS testing data for operation at the 5300 MHz channel without an indication of which device was tested. Please confirm if the DFS testing was performed on the sample for FCC ID: PPD-AR5BXB6-M or FCC ID: PPD-AR5BXB6, and whether the testing at the 5300MHz channel is representative of all channels in the 5250 - 5350 MHz and 5470 - 5725 MHz bands.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee. 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 e-mail address listed below the name of the sender.

Best regards,

Chris Harvey
charvey-tcb@ccsemc.com

6/26/2007