

Federal Communications Commission  
445 12<sup>th</sup> Street, N.W.  
Washington, D.C. 20554

Re: In the Matter of Proposed Changes in the Commission's Rules Regarding  
Human Exposure to Radiofrequency Electromagnetic Fields; ET Docket 03-137

To the Commission:

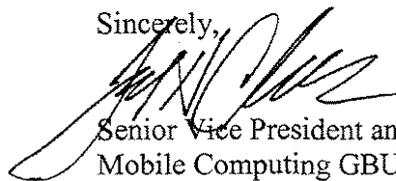
The purpose of this letter is to express Hewlett-Packard Company's ("HP") continued support for proposals made by QUALCOMM Incorporated in the above-referenced docket per our meeting on May 4, 2004. Like QUALCOMM, HP urges the Commission to establish clear rules and a streamlined approval process for the issuance of equipment authorizations for laptop computers and other devices containing embedded modules with licensed wide area wireless broadband technologies, such as EV-DO and UMTS/HSDPA.

HP is a leading manufacturer of laptops. Laptop manufacturers around the world are considering embedding technologies such as EV-DO and UMTS/HSDPA that operate on the licensed PCS and cellular spectrum. The embedding of these technologies in laptops will bring the American public enormous benefits as these wide area wireless networks permit high speed wireless internet access in the areas covered by PCS and cellular systems. Embedded wireless technologies in laptops will enable Americans to enjoy a host of new capabilities and services.

At present, the FCC's rules do not adequately provide an efficient process for obtaining equipment authorizations for these devices. We are concerned that the absence of such a process could delay the issuance of equipment. Moreover, while some modules containing wide area wireless technologies have been approved in the absence of such rules, there is no process in place for expediting approvals. At present, each laptop model in the same family of products with one of these embedded modules would have to go through the entire approval process, even if it has similar characteristics to a product in the same family for which the FCC has already issued an equipment authorization. In our business, it is critical that we be able to get new devices into the market rapidly, as the American public demands that we constantly innovate and deliver new capabilities. As a result, we agree with QUALCOMM that the FCC should adopt an efficient and streamlined process for approving these products.

Finally, it is our understanding that QUALCOMM has asked the FCC to exempt laptops, or other devices containing these modules, from having to undergo time consuming SAR testing if the devices operate at 500 mW or below at a separation distance of 10 cm. The submission should include supporting diagrams showing how the 10 cm separation distance will be maintained together with the maximum permissible emission (MPE) calculations. We believe that QUALCOMM has shown that such a threshold would be safe, reasonable, and in the public interest.

Sincerely,



Senior Vice President and General Manager  
Mobile Computing GBU, IPSC  
Hewlett-Packard Corporation