

Federal Communications Commission
445 12th 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:

We are writing to express our support for proposals made by QUALCOMM Incorporated in the above-referenced docket for the establishment of 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.

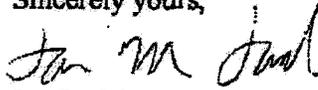
Our company is a leading manufacturer of laptops. Laptop manufacturers around the world are considering embedding technologies such as EV-DO and UMTS/HSDPA that operate on the licensed PCS and cellular spectrum. The embedding of these technologies in laptops will bring the American public enormous benefits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

At present, the FCC does not have rules governing the process for obtaining equipment authorizations for these devices. We are concerned that the absence of rules could delay the issuance of equipment authorizations that laptop vendors will need to obtain. 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 modules embedded into it would have to go through the 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 on the market rapidly, and the American public demands that we constantly innovate and develop new products. As a result, we wholeheartedly agree with QUALCOMM that the FCC should put an expedited process in place 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 if the vendor submits diagrams showing how the 10 cm separation distance will be maintaining along with maximum permissible emission (MPE) calculations. In its submissions, which we understand are based on the FCC's own

database, QUALCOMM has shown that such a threshold would be safe, reasonable, and in the public interest.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Jan M. Janick".

Jan Janick

Vice President Development

IBM PSG, PC Division