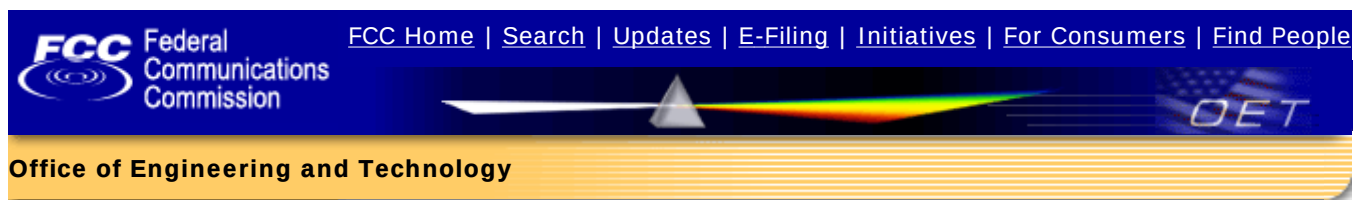


Chris Harvey

From: oetech@fccsun27w.fcc.gov
Sent: Monday, March 10, 2008 10:23 AM
To: charvey@ieee.org
Subject: Response to Inquiry to FCC (Tracking Number 512201) (TCB)
Importance: High



Inquiry:

---Reply from Customer on 03/10/2008---

Dear FCC, thank you for the response.

Yes, there are actually 3 devices in the system: a handset, a Base and the device called the Frame. The question centers around the Frame, which has significant RF power and an LCD screen large enough to be viewed away from the body, and likely to be used near the body (i.e. lap). I would agree that a handheld device with a very small screen would likely be used only in the hand, but this Frame device seems to be significantly larger, and near-body SAR seems appropriate. If you feel SAR is not required, then I will suggest they generate an MPE exhibit and a clear manual warning to keep the device 20cm or greater from the body.

As for the RF power allowed, FCC 15.319(c) allows up to 100uWatts times the square-root of the Emission Bandwidth in Hz. This Handset device has a 1.47MHz EBW, and thus has a 121milliWatt power limit. Since the antenna gain has a peak 3.5dBi peak gain, which is 0.5dB above 3dBi, the power limit would be reduced by 0.5dB, which would be 108milliWatts. The EIRP is over the Low Threshold, and thus requires SAR.

Please confirm both the MPE issue and the Power limit issues above.

Best regards,

Chris Harvey

Response:

If the frame unit is likely to be used in the lap, then body SAR is required for each antenna for which its EIRP is above the low threshold. There are no simultaneous transmission SAR procedures for UPCS devices at this moment so each antenna can be tested separately for SAR where applicable.

About the power spectral limit, you are correct, the limit is 100uWatts times the square-root of the Emission Bandwidth in Hz.

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