

Matsushita Electric Corporation of America

Product Safety & Compliance Division

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December 28, 2000
KMTDKM4-00-U60B

Re: FCC ID: ACJ96NKX-TR325
Applicant: Matsushita Electric Industrial Co., Ltd.
Correspondence Ref No: 17378
731 Confirmation Number: EA99026
Type Product: FCC Part 95 / Family Radio Service Face Held Radio

Attn.: Joe Dichoso,

This is in response to your correspondence dated 12/13/00 regarding the subject matter. Please note our following answers and comments:

1. Clarify Original vs. Class II Change Reported ERP

The Original Application dated 11/24/99 was granted on 01/18/00. Within this original filing, the test report declared the maximum conducted transmitter power was 0.479 watts and the maximum ERP was 0.398 watts. The original grant stated the output power was 0.398 watts. The Class II Change Application dated 10/06/00 declared proposed change to the antenna filter and transmitter amplifier circuitry, which would not result in any change to frequency or maximum output power. The submitted Class II test data reported reduced maximum conducted transmitter power at 0.394 watts and reduced maximum ERP at 0.279 watts. We believe this reduction in reported power may be related the production and measurement uncertainties and possibly slightly influenced by the proposed changes. On 11/15/00 FCC amended the original grant to change the output power from 0.398 watts to 0.279 watts with added footnote "This application was originally granted on 01/18/00 and added comment Power is ERP." It would appear this newly issued grant was in response to the filed class II change application, but it reflects the original application date. As such, we believe this newly issued grant should be changed back to reflect the maximum ERP is 0.398 watts.

2. Existing SAR Test Report for Original Application

At the time of the original filing, FCC did not require SAR test report so this test report was generated in IC RSS-102 format to satisfy Industry Canada. Please note the existing SAR test report showed compliance with FCC rules for body and head and IC added test requirement for eye. This SAR test report shows acceptable test results with zero antenna spacing between both head/ear and body with worst-case test results to be 1.27 W/kg for brain and 1.08 W/kg for body.

This device can operate while: (1) held 2 to 4 inches in front of mouth for open conversation; (2) or head against ear/head for private talk conversation; (3) or mounted in carrying case worn on either arm or belt-clip body while using plug-in headset/mic, earphone/mic or speaker/mic. The existing higher power SAR test results represented the worst-case test modes while this device's antenna was located directly against the head/ear and body. It does not seem reasonable or necessary to us to retest for lower power mode while configured in less exposure mode of 2 to 4 inches in front of mouth or using plug-in headset/mic.

3. Duty Cycle During SAR Tests

The subject device operates in simplex mode with RF output only in the push-to-talk mode of operation. The duty factor is 100% during transmission mode of operation and was 100% during generation of the SAR test report.

4. Copy of Original SAR Test Report

Attached find color copy of original SAR test report.

5. Body Worn Belt-Clip

The body worn belt-clip was not used during the original SAR test report as the test configuration with zero antenna spacing between both the phantom head/ear and body represented the worst-case test conditions.

6. Latest Tissue Dielectric Parameters

Noted your reference to latest tissue dielectric parameters recommended in IEEE SCC-34 measurement standards committee. We believe this updated parameters became available after the issuance of the original generated SAR test report.

7. User Information for User Manual

We believe FCC is concerned that user should be advised about general RF exposure safety information based upon products intended usage and spacing between antenna and head and body with belt-clip. However, this product has various modes of operation that allows usage while held directly against the head/ear or while used with optional headset while mounted in carrying case mounted on arm or belt-clip. As such, it does not appear to make sense to us to advise user to maintain 1 inch spacing during usage. Refer to attached copy of existing User Manual and if not satisfying FCC concerns, please advise us exactly what wording would FCC prefer.

Should you have any questions or comments, please contact the undersigned. Thank you for your attention in this matter.

Sincerely yours,



Richard Mullen

Group Manager

Product Safety & Compliance Division