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From: oetech@fcc.gov
Sent: Saturday, December 7, 2019 3:15 AM
To: Kong, Richard (CCS Kunshan)
Subject: [EXTERNAL] Response to Inquiry to FCC (Tracking Number 834211)

***** WARNING: this message is from an EXTERNAL SENDER. Please be cautious, particularly with links and attachments. *****

Inquiry on 11/19/2019 :**Inquiry:**

We have a
USB and Bluetooth Speakerphone , which needs FCC certification, and this device can be used by hand and close to body.

Due to it's a low power device, According to the KDB447498 D01 Standards: SAR test is not required. Although exempt SAR, but the customer requires testing.

Test Plan as attached.

Please kindly confirm whether this test procedure is accepted?

---Reply from Customer on 11/21/2019---

Dear Sir or Madam?

Is it acceptable for this test plan? Thanks a lot.

---Reply from Customer on 11/27/2019---

Dear Sir or Madam?

Is it acceptable for this test plan? Thanks a lot.

---Reply from Customer on 12/01/2019---

Dear Sir or Madam?

Is it acceptable for this test plan? Thanks a lot.

FCC response on 12/04/2019

Concerning question whether SAR test report can be submitted for a portable device that qualifies SAR test exclusion under the basic provisions of KDB Pub. 447498 D01, that is discouraged by FCC OET Laboratory Division, but it has not be prohibited.

The FCC equipment authorization program pursuant to 47 CFR Part 2 Subpart J (2.911, 2.1033, 2.962, etc.) predicates that certification application filings should contain supporting information and test data in accordance with requirements 47 CFR rules applicable for device and any associated OET Laboratory Division policies and procedures (including e.g. KDB publications).

Purpose rationales and technical explanations should be included where any test data is submitted voluntarily by an applicant when it is not specifically required per FCC rule or policy.

---Reply from Customer on 12/04/2019---

Based on your suggestions, we have updated the SAR test data. The main purpose is to streamline the test.

Please review it again and determine if our SAR test procedure is applicable?

If it's not suitable, where need to be updated.

Thanks!

FCC response on 12/06/2019

We have no additional comments nor concerns on the updated test plan.

Attachment Details:

[USB and Bluetooth Speakerphone Test Plan FCC](#)

[USB and Bluetooth Speakerphone Test Plan FCC_new](#)

Do not reply to this message. Please select the [Reply to an Inquiry Response](#) link from the OET Inquiry System to add any additional information pertaining to this inquiry.