

RE: RF Technologies, Inc.
FCC ID: KXU-1000-9161
ATCB021807

Typically, exhibits are submitted in a c2pc application when the proposed modifications have caused those exhibits to change from that contained the EUT's original filing. Based on the listed modifications, i.e., addition of a new antenna and portable authorization in this specific host, it is not clear that the information included in some of the documents submitted, e.g., Block Diagram, Schematics, and Theory of Operation, have changed. Please clarify the reason for the submittal of these exhibits.

Response – The addition of the new antenna is slightly different than the original filing so the schematic would be relevant to the c2pc. The block diagram and theory of operation may be less relevant to the c2pc but were submitted to further clarify the application.

What is the new antenna being added in this c2pc application? Please describe it. I note that the original filing appears to show a Fractus antenna on p.14 of the External photos similar to that shown in this application. How is this new antenna different from the Fractus antenna already authorized for use with the EUT? Please clarify.

Response – The Fractus antenna is similar to the original filing however the layout has changed slightly. Antenna layout diagram schematic has been submitted.

The Internal Photos appear to show an RF (antenna) connector at J1 that appears to have been removed from the pcb as seen in the External Photos. Please clarify if this connector will be present in the device being authorized in this application or not.

Response – J1 is a temporary antenna connector used for test purpose and not used in the final design.

Page 28 of the User's Manual lists an optional "Hinge Spring Belt Clip", presumably that which is shown attached to the EUT on pp.11 and 27 of the Manual. Please clarify if this clip includes metallic components. If so, has it been ascertained that its usage does not adversely impact the SAR levels measured and reported in the RFx report? Regarding SAR compliance, I note that KDB 447498(D01)4.2.2)a) states that "all body-worn accessories containing metallic components, either supplied with the product or available as an option from the device manufacturer, must be tested in conjunction with the host device to demonstrate compliance." Please address.

Response - The numbers are so low with the device in direct contact with the phantom there is no chance of the belt clip with metal spring causing a number higher than what has been tested. The justification would be that the antenna moves a significant distance away from the body and the introduction of the metal in the clip would keep still keep the SAR value below the level already tested.