

FCC ID: L2V-PT3
IC ID: 3989A-PT3
CT Project: p1310017

From: Chris Harvey

Date: June 24, 2013

You are apparently using the low-duty-cycle analysis to qualify for SAR exemption, which will require a PBA filing (see KDB 388624 D02 v13, item B.20.)

CT – A PBA will be filed for this device per the PBA procedures.

The separation distance of 19mm is stated in this exhibit but it is not justified or measured. Please justify this stated separation distance.

CT – A CAD drawing showing the separation distance has been provided.

The SAR exemption at 15mm is stated as 37mW, but there is no indication of where this limit comes from or any calculations to obtain this limit.

CT – This exemption comes from KDB 447498 Appendix A which is indicated at the top of page 4 of the test report.

The Duty Cycle analysis needs some correction. SAR exemptions should use the conducted power as the basis for determining SAR applicability, not the EIRP. You should review KDB 447498 D01 v05r01 section 6.3 for low transmission duty factor devices.

CT – Section 6.3 of KDB 447498 indicates that a worst case of maximum output power and minimum separation distance must be used. There is no indication that this must be conducted power and as there is a slight antenna gain in this system EIRP is the worst case. The antenna separation distance chosen for this calculation is 2 mm less than the actual separation distance.

For both items the most stringent possible combination was chosen.

Section 4.1 (2) does indicate that maximum conducted average power applies to SAR but this is incongruent with the worst case clause in section 6.3. Because of this and other statements throughout KDB 447498 indicating that a worst case analysis must always be applied EIRP was used.

Additionally this is a patch antenna which is permanently attached to the transmitter and in application the end user will most assuredly be exposed to the source based time average power in EIRP.

Please note that the FCC will review this SAR exemption exhibit under the PBA requirement so you should provide as much detail and justification as possible

CT – Noted

Response by: John Erhard

Submitted by: Amanda Reed

Date: 7/16/2013