



L. S. Compliance, Inc.

L. S. Research, Inc.



Request for FCC Opinion and Ruling

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Date : January 23, 2001

To : Mr. Kwok Chan
Company : FCC Laboratory
Phone : 301 - 362 - 3055
Email: kchan@fcc.gov



From : Jim Blaha
Company : L. S. Research and L. S. Compliance, Inc.
Phone : 262 - 375 - 4400
Fax : 262 - 375 - 4248
Email: jblaha@lsr.com

Subject: FCC Interpretation of TCB Testing Scope

Dear Kwok,

This brief memo is prepared based on our telephone conversation of January 22nd.

We discussed the interpretation of the TCB Scope in relationship to product certification.

The outcome of our discussion ended with your request to have us submit a brief overview of our product. This overview includes product description, photos and power calculations.

Based on the following information, it is the opinion of our laboratory that this product qualifies for TCB Certification. We respectfully request your opinion.

Please respond by reply email of your recommendations for the testing requirements to achieve FCC certification.

Respectfully submitted,

James Blaha
Sr. Vice-President
Quality Manager

Product Description:

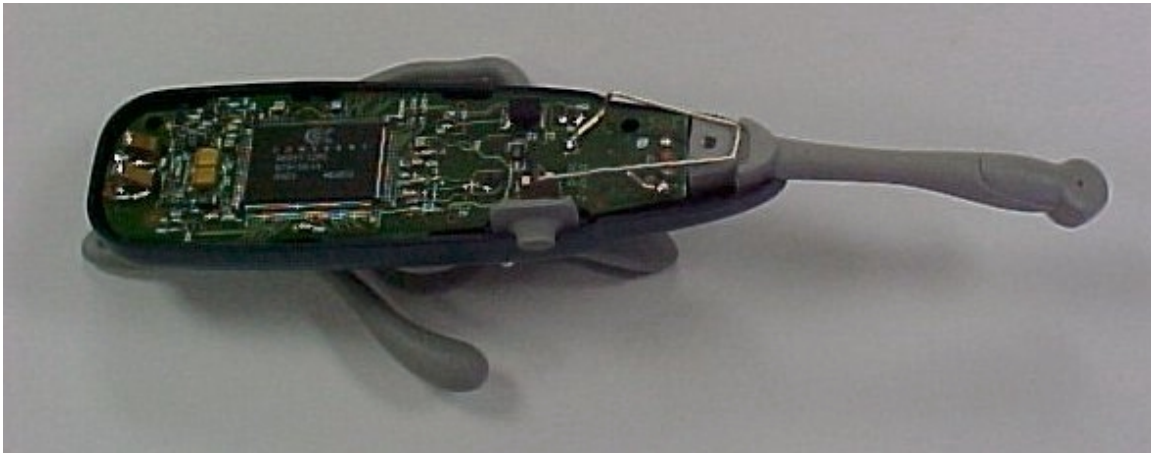
**902-928 MHz Transceiver based on Direct Sequence Spread Spectrum.
Time Division Duplexed.
Digital Voice Transmission and Receiver.
Product name for marketing: Arial Phone
Market Application: Home Office and Small Business Phone System.**

Photo's of Headset:

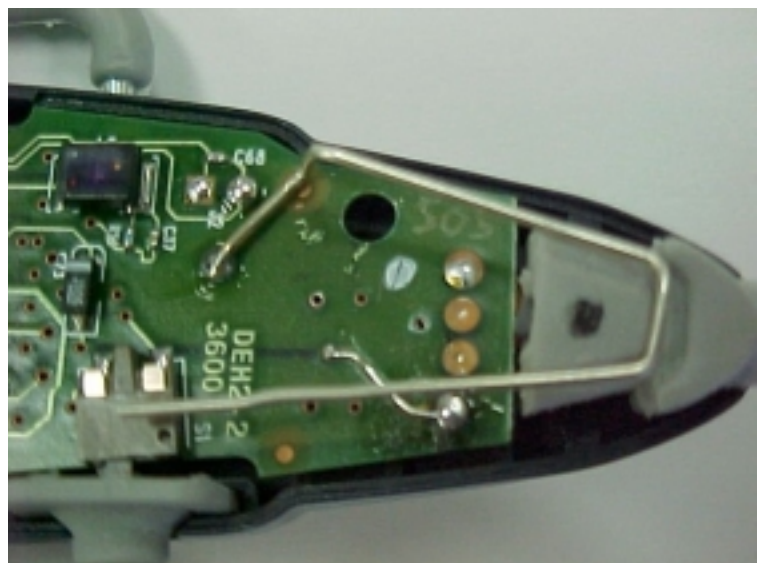
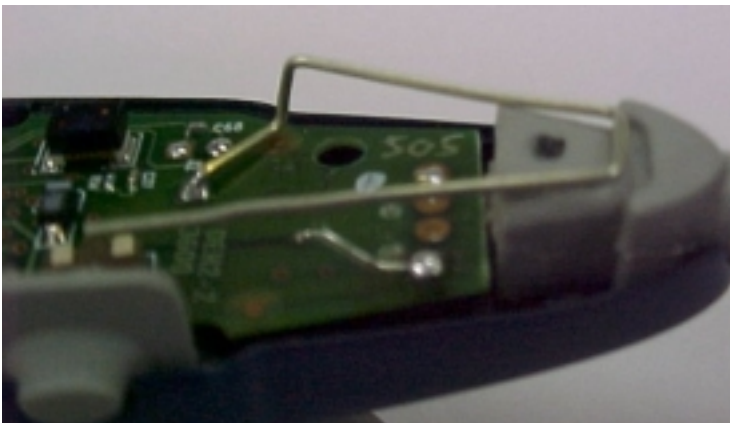
Position of Headset in relationship to Cranium



Close-up of Headset



Close-up of PCB and Antenna



Headset Dimensions:

Unit Size of: 1.25 inches - Height / 6 inches - Width / 1 inch Depth

Separation from Cranium, based on photo's supplied: 3 cm.

Headset RF Power:

Conducted RF power at the antenna port: 17 dBm

Radiated power (F.S.) at 3 meters: 108 dBmicroV / m

Calculated Equivalent ERP: 12.8 dBm or 19.05 mW - peak

L. S. Research and L. S. Compliance opinion on FCC Certification Testing:

Based on the above photos and calculations, we are of the opinion that this Phone Headset product may be tested at L. S. Compliance following FCC Part 15.247 requirements with certification filing and approval to be conducted by a TCB.

We base this opinion on the TCB – Appendix “A”, Exclusion List revised on December 18, 2000.

Specifically, Section VI – Part 15 Portable Transmitters, Paragraph e) , vii) which states TCB's are excluded if the antenna is “ less than 2.5 cm from a person's body ” AND the “ peak conducted or peak radiated (EIRP) output power exceeds 25 mW for the 900 MHz band ”.

Our calculations for both are below these limits and therefore nullify this exclusion.

Please respond by email with your opinion on this filing.

Sincerely,

**L. S. Research, Inc.
Inc.**

**Brian Petted
VP Engineering**

L. S. Compliance, Inc.

**James Blaha
Sr. Vice-President
Quality Manager**

L. S. Compliance,

**Ken Boston, PE
EMC Lab Manager**