

Klaus Knoerig

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Gesendet: Samstag, 14. Januar 2006 00:26
Betreff: Response to Inquiry to FCC (Tracking Number 603426)

Inquiry:

Dear Sir/Madam We are a TCB and we have received an application for Certification of a USB CDMA 2000 data card. The current FCC policy requires a TCB to ask for advice from FCC prior to certifying a CDMA 2000 device. Please find attached external photos and SAR test setup photos. We believe that this device could be used in body-worn configuration for example when connected to a laptop or tablet pc. Do you agree that this device can be certified as a portable device for body-worn use? We hereby ask for guidance regarding SAR review procedures. Sincerely EMCC DR. RASEK Klaus Knoerig

Response:

Please see response sent to same inquirer today in KDB244611 for overall CDMA-2000 device setup and review info.

Exact device normal use configurations are unclear from info at hand. Most USB-connected small devices are expected to have normal use positions as inserted into laptop computers and used within 20 cm of a person's body, in which case Part 22/24 devices are subject to SAR routine evaluation.

FYI note also e.g., from Oct05 TCB training notes:

- "Direct-connected" USB (without integral cable) differs from most PCMCIA in that port alignment may be horizontal (H), vertical (V), and 180 degrees H or V, with respect to a notebook computer host
- Grantee is responsible for SAR compliance in all such intended use positions
- 1-host SAR testing is accepted for many Part 15 and some licensed-service USB-dongle transmitters
 - 3-host SAR test results have been filed for some licensed-service USB dongles
 - IDB/KDB Mar04 webpost RFx Procedures 7)b), 7)c) are applicable

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