From: oetech@fccsun27w.fcc.gov
To: Suresh Kondapalli
Subject: Response to Inquiry to FCC (Tracking Number 765300) (TCB)
Date: Wednesday, October 01, 2014 6:19:14 AM
Importance: High

Office of Engineering and Technology

Inquiry on 09/29/2014 :
Inquiry:
We have received an application for protable device operating at 13.56MHz. The application claimed SAR exclusion based on KDB 447498 D01 General RF Exposure Guidance v05r02 and limits Appendix C table.

Attached RF Exposure Exhibit and Operational descrition of the unit.

Please review. Does this application review need PBA?

FCC response on 09/30/2014
Please clarify at what distance this device operates from the user.

---Reply from Customer on 09/30/2014---

This device is handheld device (Portable). The closest distance from human hand and Loop antenna is 8mm.

This is explined in RF Exposure exhibit uploaded.

TUV Rheinland

---Reply from Customer on 09/30/2014---

We corrected an error in our earlier RF Exposure Exhibit. Corrected exhibit is attached.

This device is handheld device (Portable). The closest distance from human hand to Loop antenna is 8mm.

FCC response on 10/01/2014
Per KDB Publication 447498 D01 4.3.1, unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition is satisfied. Accordingly, satisfying 4.3.1(3)(b) is allowed in lieu of measurement or numerical simulation of RF exposure.

The data presented in the attached RF Exposure Exhibit is consistent with the requirements outlined section 4.3.1(3)(b) of the referenced publication. Therefore, RF exposure evaluations would not be required. In such cases, and consistent with KDB Publication 388624 D02 Section II(A)(4), a PBA review is not applicable.

Should other circumstances not discussed within the inquiry be applicable to this EUT which are covered under KDB

Publication 388624 D02, the associated guidance would then need to be considered.

Attachment Details:

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.