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**Reply to an OET Inquiry Response**
**Currently Displaying Inquiry Tracking Number: 680475**
**Contact Information:**

Customer First Name: jack  
 Customer Last Name: Gui  
 Telephone Number: 13410295220  
 Extension:  
 E-mail Address: jack.gui@agc-cert.com

**Address:**

Line 1:  
 Line 2:  
 P.O. Box:  
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**Inquiry Details on 06/08/2018:**

First category: RF Exposure \*  
 Second category: SAR (RF Exposure)  
 Third category:  
 Subject: BT helmet SAR test  
 Inquiry: Dear Fcc:  
 The device a bluetooth helmet, we needs to test SAR ;  
 The maximum output power is about 20dbm;  
 According to the requirements of KDB447498, we need to take PAG process for FCC;  
 Could you pls suggest a measurement for us ?  
 Pls see the user manual and device photos for more information;

Thank you!

Best Wishes!

FCC Response on 06/14/2018:

Thank you for you inquiry.

1. It appears that you seem to suggest that the separation distance between the human head and the antenna is 40mm. Can this device be placed on different helmets with different padding/cushioning removed or compressed? If it has to be used for other different helmets, the distance should be conservative enough in order to cover helmets of different thickness. Please refer to section 4.2.2, c) of FCC KDB Publication 447498 D01 General RF Exposure Guidance v06
2. Based on the user manual, this device supports cell phones, remote control L3, Intercom, etc. Please describe the function of components and all transmitters/wireless technologies employed by this device.
3. Again based on the user manual, the device is equipped with volume control, multi-function button, snap ring, and Intercom button.
  - 3.1. Do any of these controllers mounted in the inside part of the helmet?
  - 3.2. Do these electronics materials contain transmitters?
4. Is there any other electronics material which contain transmitter?
5. Based on the form factor and assumed use conditions of the device, the user hands are expected to be in close proximity to the device. Please note that 10-g Extremity SAR should be considered in addition to head exposure.

---Reply from Customer on 06/20/2018---

Dear FCC,

Point 1: The device can be placed 2 model helmets ,I had print the distance for the second helmet, pls see the photos for more information;

Point 2: the device can not support "remote control L3, Intercom, etc." function, had update the usermanual ; and only support BT wireless technology;

Point 3: "volume control, multi-function button, snap ring, and Intercom button." these buttons were placed outside of helmet, pls see photos attached; and not contain any TX electronics;

Point 4: No ;

Thank you very much!

FCC Response on 06/20/2018:

Thank you for your response. Couple of items not addressed. Please see below:

1. Will this device be marketed for any helmet, or designed only for a specific helmet? In other words, can this device be placed on different helmets with different padding/cushioning removed or compressed? If it has to be used for other different helmets, the distance should be conservative enough in order to cover helmets of different thickness. Please refer to section 4.2.2, c) of FCC KDB Publication 447498 D01 General RF Exposure Guidance v06. If it is only for one helmet, the measured distance is acceptable. On the other hand, if it is marketed for any helmet and since padding/cushioning thickness of each helmet is different, or padding/cushioning can be removed or compressed, how would you guarantee that the distance you provided is conservative enough?

2. Based on the form factor and assumed use conditions of the device, the user hands are expected to be in close proximity to the device. Please note that 10-g Extremity SAR should be considered in addition to head exposure.

---Reply from Customer on 06/21/2018---

Dear FCC,

1. This device not be marketed for any helmet,just only be placed into 2 models helmets,these 2 models helmets are produced by one manufacture;

I print in the second helmet separation(8mm) is conservative ;  
I think 5mm separation we can use for test;

2. You mean we must consider 2 kinds of circumstances:

- a) less than or equal to 5mm test separation for 1g SAR,use head tissue;
- b) less than or equal to 5mm test separation for 10-g extremity SAR,use head tissue;

And your suggest ?

Thank you !

FCC Response on 06/21/2018:

Thank you for your response.

- 1. Your proposed 5 mm or less is acceptable.
- 2. Yes, a) less than or equal to 5mm test separation for 1g SAR, use head tissue
  - b) Less than or equal to 5mm test separation for 10-g extremity SAR, but use body tissue.

**Attachment List:**

[add photos](#)  
[photos](#)  
[update usermanual](#)  
[user manual](#)

[Enter any additional comments below:](#)

\*(This is a text only field. Users will be able to upload attachments after clicking on the "Proceed" button below)





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