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## Response to Inquiry to FCC (Tracking Number 655270)

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<oetech@fcc.gov>

2017年11月13日周一 (22:38)

收件人： hunk.yan@gmail.com

**Inquiry on 11/12/2017 :**

**Inquiry:**

Dear Sir/Madam,

This is hunk from china.

I have a device which has bluetooth function and a 915MHz transceiver. The device have to attach to a smartphone while the consumer use it (refer to attached user manual). Someone from a test lab tell me that it's a bluetooth sleeve accessory. It shall comply with the requirement indicated in attached TCB workshop document. But in fact, it is not permanent attached to the smartphone. So I don't think it should be consider as a bluetooth sleeve accessory and needn't to comply with the requirement in the TCB workshop document.

I want to get some information about the bluetooth sleeve accessories from the website, but sadly, I found nothing. Can you tell me the definition of the Bluetooth Sleeve Accessories and help to determine if my device is a Bluetooth Sleeve Accessory.

Thanks!

### FCC response on 11/13/2017

Thank you for your inquiry. Even though your device is not permanently attached to the host device, the fact that it does attach to a host device necessitates RF exposure evaluation. Please refer to the following FCC KDB Publications for guidance: Section 6.4 of 447498 D01 General RF Exposure Guidance v06, Section 8 of 648474 D04 Handset SAR v01r03, and slide 12 of the RF Procedures presentation at the April 2016 TCB workshop. The aforementioned guidance documents may be found online at [https://apps.fcc.gov/oetcf/kdb/reports/](https://apps.fcc.gov/oetcf/kdb/reports/GuidedPublicationList.cfm) and the TCB Workshop presentations can be found online at <https://www.fcc.gov/general/equipment-authorization-presentations>.

On a final note, your device may qualify for SAR test exclusion based on its conducted output power and/or duty cycle. Please refer to sections 4.3.1 and 6.3 of 447498 D01 General RF Exposure Guidance v06 for guidance on SAR test exclusion and low transmission duty factor devices respectively.

--Reply from Customer on 11/13/2017--

Dear Sir/Madam,

Thanks for your detail guidance.

But my device is even not a sleeve, I still thought we can't consider it as a Bluetooth sleeve accessory. So if my device satisfied the requirement in section 4.3.1 and 6.3 of 447498, can we ignore the requirement indicated in slide 12 of the RF Procedures presentation at the April 2016 TCB workshop?

Thanks!

### FCC response on 11/13/2017

The first step is to determine if your device is excluded from SAR testing. If yes, then there is no need to test SAR and the guidance from the TCB workshop slides (which pertains to SAR testing for Bluetooth Sleeve Accessories) is not applicable. If your device does not qualify for SAR test exclusion, then some form of testing will need to be performed. Even though your device is strictly speaking not a Bluetooth Sleeve, it is similar in nature so a modification of that guidance might be used to provide test configurations. However, as mentioned above, if you qualify for SAR test exclusion for both the Bluetooth and the 915 MHz transceiver, you do not need to consider the guidance from the TCB workshop slides.

#### Attachment Details:

[TCB workshop document](#)

[User manual](#)

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