

From: oetech@fcc.gov
To: [Suresh Kondapalli Intertek](#)
Subject: [External] Response to Inquiry to FCC (Tracking Number 675079) (TCB)
Date: Wednesday, November 24, 2021 7:52:39 AM
Importance: High

Inquiry on 08/02/2021 :

Inquiry:

Dear FCC official,

Our client wants to use extrapolation method for evaluation of SAR for higher power, re-tuned and more efficient body worn charger. This external charger is used for charging an implant device.

The original test was performed accredited test lab.

The external body worn charger operates at 6.78MHz, improvements were made for higher efficiency and to reduce time spent for body worn condition. NO changes are made to implant device.

Attached here are two documents

a) SAR Compliance
Characterization: Extrapolation method proposed to be used along with original SAR evaluation by accredited test lab.

b) Proposed change by Galvani Inc.

The following are questions

1) Is the proposed
extrapolation method acceptable to FCC?

2) Is SAR evaluation
by extrapolation by manufacturer acceptable?
Or Is it necessary
it done by accredited SAR test lab for final certification by a TCB.

FCC response on 08/04/2021

We know that Extrapolation is needed to obtain the missing points near the phantom edges. These points can be obtained either from the measurement data alone or together with the interpolated data, but you need to clearly show how extrapolation errors are estimated.

The test needs to be done by accredited SAR test lab for final certification by a TCB

---Reply from Customer on 11/18/2021---

Dear Sir/ Madam,

SAR testing was performed by accredited test lab . The SAR test report is attached here.
Measured SAR value is low 0.649 W/Kg for 1g Avg.

Is anything more required with this application

Regards,
Suresh Kondapalli

FCC response on 11/23/2021

Please provide the FCC ID number associated with this application

---Reply from Customer on 11/23/2021---

Dear FCC official,

Here is proposed FCC ID of the IPG charger. This is currently under TCB review not completed.

FCC ID: 2AVN4-31102

FCC response on 11/24/2021

FCC response on 11/24/2021

Why are you filing a PAG if it is still under TCB review

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Attachment Details:

[Proposed changes \[apps.fcc.gov\]](#)

[SAR test report \[apps.fcc.gov\]](#)

[setup photos \[apps.fcc.gov\]](#)

[System check plots \[apps.fcc.gov\]](#)

[Highest Test plots \[apps.fcc.gov\]](#)

[Tissue Properties \[apps.fcc.gov\]](#)

[SAR certificate \[apps.fcc.gov\]](#)

[SAR Dipole cert \[apps.fcc.gov\]](#)

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