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FCC Equipment Authorization Branch

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1) Please clarify details of 50% duty factor mentioned in the result tables in Section 4.5 and 7.2. . Page 10 suggests that testing was performed with 100% duty factor.

A1) Since D.U.T is designed to be used as Push-To-Talk operating unit, the Source-based time-averaging factor of  $\frac{1}{2}$  (50 %) was applied to calculate the final SAR value while the actual test was performed with D.U.T transmitting in CW. For example, when we measured 4.0 W/Kg of 1g-SAR from D.U.T. transmitting in CW, we reported 2.0 W/Kg and explicitly indicated that “50% source-based time-averaging factor was applied to calculate the SAR value” in test report.

And also there is warning statement about operating condition in User’s manual to attract the user’s attention to this issue as well.

2) Please update the user instructions to include information about transmission with VOX mode and information how the user will maintain 50% duty factor.

A2) See revised User’s manual (Page 32) uploaded along with this correspondence.

3) The power drift measurement shows considerable drift. How was this accounted for in the measurements? To confirm that results are valid

Please repeat worst case configuration test after waiting 5 minutes of transmission (after most drift occurs. Please scale the SAR value up to the full power value.)

A3) Our SAR measurement system do not account for the power drift and this is one of the reason we are including the \*\*\*additional\*\*\* power drift measurement in our report for the reviewer’s convenience. In this particular case, after we scaled up the final SAR value by the worst case power drift percentage, the final worst case scaled up SAR measurement would be less than 2.0 W/Kg which is quite well below the 8.0 W/Kg limit. Therefore the D.U.T. is safely ensured to be compliance with the RF exposure safety.