

ATCB ID: ATCB006457
FCC: AFJ289402

1) It does not appear that confidentiality was requested on any exhibits provided. However the application includes exhibits typically classified by most grantees as confidential (block diagram, schematics, operational description, parts list, and tune up procedures as a few examples). If confidentiality is requested, kindly provide an appropriate cover letter.

A1) Confidentiality request letter was uploaded on July 02 and the file name is "IC-F4161__ConLtr.pdf".

2) Additionally, a partial parts list is given with the Permissive Change Letter. If confidentiality is requested on the parts list portion of this, please divide into 2 separate documents, one containing the letter only, the second containing the parts list.

A2) Separated documents were uploaded on July 02.

3) Tune up procedure mentions frequencies outside of the approved band. Kindly explain.

A3) Tune up procedure is used for radio alignment purpose only.

4) Test report mentions use only to 512 MHz and originally this was granted to 520 MHz. Please explain.

A4) Frequency was listed 450-520 MHz in the original filing however new FCC frequency listing policy (KDG 634817) requires that test should be performed only on the allowed frequencies and Part 90 allowed frequency is up to 512 MHz. We contacted FCC lab help and was replied that testing at 512 MHz and frequency listing up to 520 MHz is alright with appropriated justification letter.

5) Users manual page 31 contains many more accessories than listed in the original manual. Please explain.

A5) Manufacturer provided user manual with all those additional accessories removed and ensured that those will not be provided with this product. The revised users manual has been uploaded to ATCB filing site.

6) It appears that only the body SAR was remeasured. Please provide a statement confirming compliance with the limits for Head SAR. If maximum SAR value increases, submit appropriate test data.

A6) In the original filing, the Body SAR was found to be worst case with the head SAR found to be relatively much lower (more than 3dB below the FCC limit). Since this Class II Permissive Change application is due to modifications only in the Receiver circuitry of DUT (no Tx portion has been modified or accessories added), it is reasonable to assume that there will be no significant impact on the SAR characteristics given that the changes are in the receiver portion and would not affect the surface RF currents responsible for SAR. It was therefore sufficient to show continuing compliance with FCC requirements by re-measuring the SAR value for the worst case condition which was determined to be the Body worn configuration.