

From: Sam Dulaney [sdulaney@Ritron.com]
Sent: Thursday, April 22, 2004 4:44 PM
To: 'Eric'
Subject: RE: FCC audit of application for Ritron Inc FCC ID:
AIERIT18-156

Follow Up Flag: Follow up
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Eric:

The subject device is designed such that it would not be operating closer than 20 cm to a person's body. It is NOT a portable device and would not, in normal operation, be held near the body. The gain of the microphone, the speaker audio level and the nature of the front panel button are such a person would be at least 20 cm from the front face of the unit. Further, the antenna is located another 8-10 cm behind the front panel. This would place a person at least 28 cm from the radiating element of the device. The RF Exposure warning statement in the Users Manual specifies that persons should not be closer than 20 cm (RF exposure limits are acutally met at 18 cm) when the internal antenna is used and must stay at least 28 cm away from magnet mount antenna when it is used. The magnetic mount antenna would not normally be located near the unit or persons operating the unit, certainly not within 28 cm.

Sam L. Dulaney
Chief Engineer
Ritron, Inc.

-----Original Message-----

From: Eric [mailto:eric@timcoengr.com]
Sent: Thursday, April 22, 2004 3:02 PM
To: sdulaney@ritron.com
Cc: Bruno Clavier
Subject: FCC audit of application for Ritron Inc FCC ID: AIERIT18-156

Hello, Sam:

The FCC has performed an audit of the subject application and had the following comments:

FCC quote:

"MPE estimate using OET 65 equation 3 is not applicable for FCC RF exposure evaluation purposes for devices that operate at closer than 20cm to a person's body. Please revise RF exposure exhibit."

Our Chief Engineer, Bruno Clavier, has reviewed the FCC comments with regard to this application and had the following to say:

"This device may be used at distances closer than 20cm from the body during normal operation. The MPE calculations should be removed. According to page 1 of the user's manual, the call box is intended for occupational users. As a portable device, the RFx exhibit should contain such information:

a/ Portable operating configuration

b/ RF exposure conditions - Occupational user/controlled environment.

c/ This transmitter is exempted from SAR evaluation to qualify for TCB approval according to TCB exclusions list of July 17, 2002. The low threshold (in mW) for distances greater than or equal 2.5cm is $900/f \text{ (GHz)} = 900/0.155 = 5,807 \text{ mW} \sim 5.8\text{W}$

d/ label on device visible to the operator indicating specific RF exposure training required - the label should use fonts that are legible to all users under normal circumstances, without reading aids, and printed on durable material with permanent ink (Please, see attached)

e/ The user's manual must contained instructions for the occupational use only.

- device is for occupational use only in the course of employment

- identify the location of all training material

- identify the training is required to satisfy FCC RF exposure compliance requirements. Training - to make the user fully aware of the potential for exposure and how to exercise control over their exposure

- Caution, Warning, Notice etc., as appropriate for the exposure conditions and compliance requirements"

The sample label that Bruno speaks of is attached.

Please let me know if you concur or if you have any comments or questions.

It looks like we would need a revised manual, revised MPE exhibit and a sample of the RF exposure label.

Eric Dobson

Quality Manager

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